

California Regional Water Quality Control Board

San Francisco Bay Region

Arnold

Terry Tamminen
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Protection

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Arnold Schwarzenegger Governor

TO:

Interested Persons

(see list attached)

By E-Mail & Regular Mail

FROM:

Bruce Wolfe

File No. 41S0002 (SIM)

Executive Officer

SAN FRANCISCO BAY

REGIONAL WATER QUALITY CONTROL BOARD

DATE:

MOV 0 3 2004

SUBJECT:

Adopted Resolution R2-2004-0087

AUTHORIZING THE EXECUTIVE OFFICER TO ENTER INTO AN AGREEMENT FOR MUTUAL RELEASE AND COVENANT NOT TO SUE WITH 301 INDUSTRIAL LLC FOR PROPERTY LOCATED AT 301 INDUSTRIAL WAY IN THE CITY OF SAN CARLOS, SAN MATEO

COUNTY, CALIFORNIA

Attached is the Resolution (with an attachment and exhibits) adopted at the Regional Board meeting of October 20th. The Resolution authorized the Executive Officer to complete the Mutual Release (aka Prospective Purchaser Agreement) with 301 Industrial LLC.

If you have questions, please contact Steve Morse (tel: 510-622-2393; e-mail: sim@rb2.swrcb.ca.gov).

Attachments:

Interested Persons List

Resolution No. R2-2004-0087

Attachment: Mutual Release and Covenant Not to Sue

Exhibit A. Property Legal Description

Exhibit B. Approval Letter for Remedial Action Plan and Addendum Remedial Action Plan

Addendum to Remedial Action Plan

Exhibit C. Written Instrument of Release and Transfer Document

Interested Persons List 301 Industrial LLC Adopted Resolution R2-2004-0087 October 20, 2004

Alan Leavitt, P.E. 301 Industrial LLC c/oNorthgate Environmental Management Inc. 3629 Grand Avenue Oakland, CA 94610

Stephen W. Lavinger, Chief Tiered Permitting Corrective Action Branch Permitting and Corrective Action Division Cal DTSC

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Gary Kern Varian Medical Systems, Inc. 3100 Hansen Way Palo Alto, California 94304

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Barbara Cook, P.E., Chief Northern California – Coastal Cleanup Operations Branch 700 Heinz, Suite 200 Berkeley, California 94710

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN FRANCISCO BAY REGION

RESOLUTION No. R2-2004-0087

AUTHORIZING THE EXECUTIVE OFFICER TO ENTER INTO AN AGREEMENT FOR MUTUAL RELEASE AND COVENANT NOT TO SUE WITH 301 INDUSTRIAL LLC FOR PROPERTY LOCATED AT 301 INDUSTRIAL WAY IN THE CITY OF SAN CARLOS, SAN MATEO COUNTY, CALIFORNIA

WHEREAS, the California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Board), finds that:

- 1. **Jurisdiction:** The manufacturing plant is located at 301 Industrial Way in San Carlos, California, comprising approximately 18.5 acres (the Property). The Property is more accurately described in the legal description (Exhibit A to the Mutual Release Attachment). The Board has authority as a state regulatory agency under the California Water Code to oversee site cleanup for the residual pollutants and contaminants found on the Property.
- 2. **Site Investigations:** Investigations have shown that the Property was historically marshland that was filled and developed for industrial use in the 1950's. Recent soil and groundwater testing of the Property shows that while it contains detectable concentrations of a number of regulated chemical compounds, including PCBs, volatile organic compounds, and heavy metals; its use as an industrial site is not compromised by these compounds. Groundwater is not currently used as a drinking water supply and no such use or need is anticipated for the foreseeable future, as groundwater is brackish due to the proximity of the Bay.
- 3. **Current Property Situation:** The Property is currently owned by Communications and Power Industries, Inc. ("CPI") and is currently operated as an electronic component manufacturing plant. No other former uses are known. CPI and 301 Industrial Way LLC ("301") have entered into negotiations for 301's purchase of the Property.
- 4. **Site Redevelopment:** 301 is a California limited liability company. It intends to complete the purchase of the Property on or about November 1, 2006, perform demolition of all site improvements, remediate the Property in accordance with the Remedial Action Plan ("RAP") which is Exhibit B to the Mutual Release Attachment to this Resolution and prepare the Site for unrestricted redevelopment. The current proposed re-use is as a new hospital to serve the people of the greater Bay Area.
- 5. **Future Actions Under Redevelopment:** Conditioned on the project proceeding, the RAP will guide site remediation activities. Any contaminated soil found on the Property during demolition, grading, or redevelopment will be remediated to Unrestricted Use Standards. "Unrestricted Use" means and includes residential housing, children facilities (e.g., daycare, K-12 schools, preschools, playgrounds), elderly facilities (e.g., nursing homes; hospices; convalescent homes; senior centers; assisted living facilities), places of worship, hotels, motels, hospitals, skilled nursing facilities, medical facilities, and similar sensitive receptors. Any contaminated groundwater encountered in excavations for Property improvements will be handled appropriately as specified in the RAP. Based on

the extent of the investigative work completed at the Property to date and on the remedial approach set forth in the RAP, the post-remediation Property conditions will not create an unacceptable risk to human health or the environment. After the RAP has been successfully implemented, the Board does not expect any further remediation of soil and/or groundwater will be needed nor require engineering and/or institutional controls to allow for Unrestricted Use.

- 6. **301 Industrial LLC's Request:** 301 seeks a commitment from the Board that approves of the RAP and also that 301 and its members, officers, directors, shareholders, employees, partners, partnerships and partners of such partnerships, representatives, agents, affiliates, tenants, lenders, agents, representatives, and their respective assigns and successors ("Buyer Related Parties") in interest will not be named as dischargers (or responsible parties) in a Board enforcement order with regard to existing known conditions of contamination solely by virtue of purchasing the Property. Specifically, 301 requests that the Board execute a Mutual Release and Covenant Not to Sue ("Mutual Release") with the Buyer Related Parties for the Property based on the RAP. Without this assurance from the Board, 301 states that it will not be able or willing to complete the purchase and redevelopment of the Property.
- 7. **Board Authority:** Pursuant to Water Code §13304, the Board can enter into agreements whereby the Board covenants not to name prospective purchasers, tenants, lenders, and related parties in enforcement actions for known conditions of contamination. The Board may enter into such agreements if it is sufficiently in the public interest to warrant expending public resources necessary to reach such an agreement.
- 8. **Benefits of Redevelopment**: The Property is located in an area that is redeveloping to more intense commercial, office, and industrial uses from the former filled marshlands and/or manufacturing uses. Redevelopment of the Property would have economic and social benefits to the local community and to the public at large. The proposed redevelopment will provide about 1450 new permanent jobs with an estimated annual payroll of over \$90,000,000, will utilize existing infrastructure, increase available hospital beds and medical care to the greater Bay Area, and diminish demand upon existing fringe areas.
- 9. CEQA: The purchase of the Property is not an activity that requires Board approval. Furthermore, neither the Property transaction nor the Board's approval of the Mutual Release is a "project" as defined by Public Resources Code Section 21065 and 14 CCR 15378(a) such that the California Environmental Quality Act (CEQA) applies.
- 10. **Public Notice:** The Board provided notice of its intention to consider this matter at the October 20, 2004 Board meeting and provided an opportunity for interested persons to comment on the draft resolution and its attachments.
- 11. **Public Hearing:** The Board, at a public meeting, heard and considered all comments pertaining to this item.

San Francisco Bay Regional Water Quality Control Board Attachment to Resolution No. R2-2004-0087

NOW, THEREFORE BE IT RESOLVED, that the Board authorizes the Executive Officer to negotiate minor amendments to the draft Mutual Release (Attachment), and to sign and execute the final Mutual Release and any other associated documents.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of a Resolution adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on October 20, 2004.

Bruce H. Wolfe Executive Officer

Attachment - Mutual Release and Covenant Not to Sue

Exhibit A. Property Legal Description

Exhibit B. Approved Remedial Action Plan (RAP) and Addendum

Exhibit C. Written Instrument of Release and Transfer Document

California Regional Water Quality Control Board San Francisco Bay Region

Attachment to Resolution No. R2-2004-0087 Mutual Release and Covenant Not To Sue

301 Industrial Way, San Carlos, San Mateo County, California

I. Introduction

This Mutual Release and Covenant Not to Sue ("Mutual Release") is provided in response to a request by the prospective purchaser, 301 Industrial LLC ("Buyer"), a California Limited Liability Company and pursuant to San Francisco Bay Regional Water Quality Control Board ("Regional Board", "Board" or "RWQCB") Resolution No. R2-2004-0087 ("Resolution") authorizing its Executive Officer to finalize negotiations and sign the Mutual Release and associated documents concerning the currently operating Communications and Power Industries, Inc. ("CPI") manufacturing site located at 301 Industrial Way, in San Carlos, California ("Property"). The legal description of the Property is attached hereto and incorporated by reference as "Exhibit A."

Buyer desires a commitment, to the maximum extent permitted by law, that it, its parents, subsidiaries, partners, partnerships, affiliates, subsequent purchasers, tenants, lenders, and any occupants of the Property, as well as all of their members, partners, partnerships, shareholders, directors, officers, employees, agents, attorneys, and their respective successors and assigns (individually, "Released Party" and collectively, "Released Parties") will not be subject to liability for, or the subject of any actions, orders, or other liabilities or requirements related to or arising from the "Known Conditions" (defined below).

II. Definitions

For purposes of this Mutual Release, "Known Conditions" or "Known Condition" means all conditions of pollution in, at, under, originating from or migrating onto or off of the Property or any portion thereof, that were known to the Regional Board as of the Effective Date (defined below). The phrase "known to the Regional Board" refers to information regarding pollution in, at, under, originating from or migrating onto or off of the Property, or any portion thereof, that was disclosed to the Regional Board or is reasonably discernible from the reports, investigations, workplans, or any other information submitted to the Regional Board prior to the Effective Date. With respect to any claim, cause of action, investigation, or enforcement action asserted or required by the Regional Board, the Released Parties shall bear the burden of proving to the Regional Board that the condition of pollution at, under, or originating from the Property for which the Regional Board is pursuing a claim, cause of action, investigation or enforcement action is a Known Condition.

III. Findings of Fact

This Mutual Release is based on the following findings by the Regional Board:

1. The Property is within the jurisdiction of the Regional Board due to the Known Conditions. The Regional Board enters into this Agreement pursuant to California Water Code Sections 13000 et seq. The Regional Board may release and covenant not to sue or assert claims for environmental investigation or remediation or other related claims against prospective purchasers, and related parties, of environmentally impacted properties, especially where, as here, the agreement is sufficiently in the public interest.

- 2. The Property has been used as an electronics manufacturing facility since the mid-1950s by a number of operators, including CPI, Varian Power Grid Systems, and Eitel-McCullough, Inc. The Property is approximately 18.5 acres in size, is generally flat with an elevation of about 5 feet above MSL. The upper 5 to 10 feet of the site consists of fill overlying historical marshland and Younger Bay Mud. The nearest surface water (Phelps Slough) is located approximately 300 feet to the east, which drains into the Steinberger Slough and then into San Francisco Bay. Depth to groundwater is typically 6 to 10 feet below ground surface. Past and recent soil and groundwater testing of the Property shows that it contains detectable concentrations of a number of regulated chemical compounds, including volatile organic compounds, PCBs, petroleum products, and heavy metals including chromium and nickel. Site groundwater contains total dissolved solids at a level that precludes the beneficial use of drinking water being designated. Previously, the RWQCB and the Department of Toxic Substances Control have determined that existing site conditions are acceptable for industrial use, but that soil and groundwater cleanup is required or anticipated with respect to the on-site Known Conditions if site uses change. Buyer proposes to complete a cleanup of the site as described in the Remedial Action Plan ("RAP") and Addendum filed with the Board and attached hereto as "Exhibit B" and Incorporated by reference to obtain an unrestricted use no further action letter from the Board. Completion of the RAP, as amended by the Addendum, is expected to yield site conditions that are acceptable for unrestricted use without the need for engineering or institutional controls.
- 3. Remediation steps will include (a) cessation of CPI's operations at the Property; (b) CPI's regulatory closure of all of the regulated units existing at the Property; (c) CPI's move out from the Property; (d) purchase of the Property by the Buyer; (e) demolition of the Property improvements, including all above grade structures and associated asbestos and lead paint abatement; and (f) satisfactory implementation of the RAP, as amended by the Addendum, by the Buyer, including cleanup and confirmation sampling. By contract, CPI is obligated to move out of the Property no later than 30 months from the date of the Board's approval of the RAP (August 31, 2004). Purchase of the Property is anticipated to be completed at the time CPI has moved out and obtained regulatory closure.
- 4. The Released Parties are not responsible parties or affiliated with a responsible party for the known contamination or pollution, and will not be prior to November 1, 2006, an owner of the Property. The sole interest of Buyer in the Property is to purchase and redevelop the Property.
 - Buyer is arranging for the redevelopment of the Property to a productive use that will benefit the public and the community. Estimated benefits to the community include infilling, the use of existing infrastructure, providing jobs for about 1450 persons, with a payroll of about \$90,000,000 annually and the addition of needed hospital beds and medical care for the people of the Bay Area.
- 5. By entering into this Agreement, Buyer certifies that to the best of its knowledge and belief, it has fully and accurately disclosed to the Regional Board any and all information known to its officers, directors, employees, contractors and agents about pollution and/or contamination of the Property.
- 6. The Property is not the subject of active enforcement actions or agreement(s) with another agency to address the residual pollution at the site.
- 7. Buyer will pay for all reasonable costs associated with the Regional Board's development and oversight of this Mutual Release pursuant to the California Water Code.

- 8. This Mutual Release is consistent with the goals and purposes of state and federal law, including the Porter-Cologne Act and the federal Clean Water Act.
- 9. In order to ensure that no activities at the Property, with the exercise of due care, will aggravate, contribute to or create a condition of pollution or nuisance as a result of the Known Conditions, this Mutual Release will not require the application of engineering and institutional controls if the objectives of the RAP, as amended by the Addendum, are met.

IV. Agreement

- 1. In accordance with the Resolution, the Regional Board expressly finds that the Released Parties shall not be liable or otherwise responsible for such Known Conditions and hereby covenants and agrees not to initiate, bring, or support any claim, order, demand, enforcement action or other civil or administrative proceeding against the Released Parties or their respective successors and assigns upon satisfaction of the conditions set forth in the next sentence with respect to such Known Conditions under any local, state or federal statute, common law, or equitable doctrine, including but not limited to, in their entirety, the United States Code, the various California Codes, or other applicable laws, regulations, ordinances, or civil, judicial or administrative authorities, having application to the handling, release, presence, migration to, through or from, cleanup, containment or maintenance of the Known Conditions at, on, under or originating from the Property, or any portion thereof. This Mutual Release shall inure to the benefit of, and pass with each and every portion of the Property and shall benefit any respective successors and assignees of the Released Parties, provided such successors and assignees did not cause or contribute to the Known Conditions and provided further each such party that is not a signatory to this Mutual Release executes a written instrument in the form of Exhibit C hereof.
- 2. To the extent the Released Parties are entitled to protection from contribution actions or claims as provided by CERCLA Section 113(f)(2), 42 U.S.C. Section 9613(f)(2), for matters addressed in the Resolution, the Mutual Release and Covenant Not to Sue and the RAP, the parties agree that the Released Parties are entitled to invoke such protection.
- 3. This Release shall remain effective notwithstanding the revocation or modification of Board Resolution No. R2-2004-0087, and shall be without prejudice to the ability of the Regional Board to take action against any party other than the Released Parties, relating to the investigation, cleanup, or cost of investigation or cleanup of the Known Conditions. Except as provided in Paragraph 6, nothing contained in this Mutual Release is intended to waive, limit, preclude, diminish or hinder any right of the Released Parties now or in the future available in law, equity, or by agreement.
- 4. Notwithstanding any other provisions of this Mutual Release, the Regional Board reserves the right to assert any claims, enforcement actions or other civil or administrative proceeding against the respective Released Parties arising after the Effective Date which are based on the failure of the respective Released Parties, to the extent they have control over the Property, to (i) exercise due care at the Property with respect to the Known Conditions, (ii) comply with the above-described findings, (iii) satisfactorily implement and comply with the RAP, as amended by the Addendum, and (iv) cooperate in providing reasonable access to the Property as required by the

Regional Board. If the Regional Board determines that a Released Party has failed to materially comply with any of these four enumerated requirements, after notice and reasonable opportunity for cure, and the Regional Board elects to proceed against that Released Party, then this Mutual Release shall be suspended as to that Released Party, and the Regional Board and the Released Party shall then have any rights or defenses they would have had as if this Mutual Release and Covenant Not to Sue had not existed. If, following such proceeding, the Regional Board determines such action to be warranted, it may declare this Mutual Release to be null and void, with respect to that specific Released Party.

- 5. The reservation by the Regional Board set forth in Paragraph 4 shall be separately and distinctly applied with respect to each of the Released Parties, the intent being that failure by a particular Released Party to comply with any applicable requirement shall not render the Regional Board's covenant inapplicable to any other Released Party. Nothing contained in this Mutual Release shall be deemed a waiver of, or a release by, any Released Party of any defense available to such Released Party in response to any claim, order, demand, enforcement action or other civil or administrative proceeding by the Regional Board in contravention of this Mutual Release.
- 6. In partial consideration therefore, the Released Parties, on behalf of themselves and their respective successors in interest, hereby release and covenant not to sue the Regional Board, its authorized officers, employees or representatives, with respect to any and all liability or claims associated with or arising out of the Known Conditions.
- 7. The Mutual Release shall not prohibit the Regional Board from asserting any claim, enforcement action, or other civil or administrative proceeding related to any condition of pollution at, under, or originating from the Property that are not Known Conditions.
- 8. Each Released Party not defined above as a Released Party shall, as a precondition to receiving the benefits conferred by this Mutual Release, execute a written instrument in the form attached hereto and incorporated by reference as Exhibit C. Execution and mailing of Exhibit C to the Regional Board by or on behalf of any corporation, partnership, or other entity, shall be sufficient to confer the benefits of the Mutual Release upon all affiliates, parent or subsidiary corporations, and the respective directors, officers, employees, partners, members, agents, successors, and assigns of each such entity.
- 9. The Released Parties further agree to exercise due care at the Property with respect to the Known Conditions, and to comply with the above described RAP, as amended by the Addendum, to comply with all applicable local, state, and federal laws and regulations regarding the Property, and to cooperate in providing the Board, its agents, or Responsible Parties, reasonable access to the Property for any necessary monitoring purposes and any necessary operation, maintenance, and repair of wells and remediation facilities.
- 10. This Mutual Release shall be in full force and effect from the Effective Date. The Effective Date shall be the date upon which Buyer or its successor or assign takes title to the Property, whichever is later. Buyer shall have ninety (90) days from the date upon which it takes title to record the Mutual Release and Exhibits A, B, and C against the Property, provided that such period shall be extended by the period of time required by the Executive Officer to fully execute the Mutual Release. A copy of the recorded Mutual Release and Exhibits A, B, and C shall be provided to the Regional Board within twenty (20) days of the recording. The Regional Board shall provided acknowledgement of receipt of the recording as required by this paragraph. Notwithstanding anything to the contrary in the foregoing, if Buyer or its successor(s) fails to record the Mutual

San Francisco Bay Regional Water Quality Control Board Attachment to Resolution No. R2-2004-0087

Release and Exhibits A, B, and C within the time frame set forth above, and Regional Board or Executive Officer in its discretion does not extend the time, this Mutual Release shall automatically terminate.

- 11. This Mutual Release may be executed in one or more counterparts, each such counterpart being deemed an original but all counterparts constituting a single instrument.
- 12. Each of the undersigned parties hereby certifies, and warrants that he or she is authorized to bind his or her agency or entity to the continuing obligations described herein.

CALIFORNIA REGIONAL WATER QUALITY BOARD SAN FRANCISCO BAY REGION

By:	301 INDUSTRIAL LLC
Bruce H. Wolfe, Executive Officer	a California Limited Liability Company
Date:	By:
	A Member
	Date:

San Francisco Bay Regional Water Quality Control Board Attachment to Resolution No. R2-2004-0087

STATE OF California)) S.S.				
COUNTY OF Alameda)				
such County and State, pe	, before me, ersonally appeared , personally know			a notary public i and the basis of satis	-
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WITNESS my hand and o	official seal.				
			Notary	Public	
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COUNTY OF)	S.S.			
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WITNESS my hand and o	official seal.				
			Notary	Public	

San Francisco Bay Regional Water Quality Control Board Exhibit A to Attachment to Resolution R2-2004-0087

APPENDIX I A

LEGAL DESCRIPTION

Real property in the City of San Carlos, County of San Mateo, State of California, described as follows:

All of Parcel 1 as shown on the Parcel Map recorded in Volume 20 of Parcel Maps at page 23 in the Records of said County, described in metes as follows:

Beginning at Northerly corner of said Parcel; thence through the following numbered courses:

- 1) South 37° 56' 04" East 739.82 feet to a curve to the right with a radius of 447.00 feet
- 2) along said curve through a central angle of 33° 54' 48" an arc distance of 264.58 feet
- 3) South 04° 01' 16" East 182.93 feet to a curve to the left with a radius of 553.00 feet
- 4) along said curve through a central angle of 02° 38' 43" an arc distance of 25.53 feet
- 5) South 46° 51' 36" West 476.39 feet
- 6) North 42° 08' 24" West 1153.65 feet
- 7) North 47° 51' 36" East 752.91 feet to the point of beginning.

APN: 046-051-020 and 046-051-070



California Regional Water Quality Control Board

San Francisco Bay Region

Terry Tamminen
Secretary for
Environmental
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612 (510) 622-2300 • Fax (510) 622-2460 http://www.swrcb.ca.gov/rwqcb2



Date: August 31, 2004 File No. 41S0002 (SIM)

Mr. Alan Leavitt, P.E. Principal Northgate Environmental Management, Inc. 3629 Grand Avenue Oakland, CA 94610

Subject: Approval of Remedial Action Plan (RAP) dated June 16, 2004

(with Addendum dated August 25, 2004)

Communications and Power Industries property at 301 Industrial Way, San Carlos,

as requested by 301 Industrial LLC

Dear Mr. Leavitt:

We have reviewed and hereby approve the Remedial Action Plan and Addendum (RAP) for the above site that will allow for unrestricted use of the property. The approved RAP will be used to facilitate the development of the property. You have informed us that 301 Industrial LLC proposes to purchase the CPI site, develop it utilizing the RAP for probable sale to a private hospital and medical facility, and also utilize a Prospective Purchaser Agreement currently scheduled for adoption at the Board's October 20th meeting.

Previous contamination removal and closures and No Further Action Letters were sufficient for the existing industrial/commercial use. Redevelopment of the property to a hospital requires additional selected site cleanup so that the site meets unrestricted residential levels. The RAP will use the Regional Board's Residential ESLs as the Remedial Action Plan's cleanup goals to allow for unrestricted use. We concur in the concept as described in the RAP. Robust confirmation sampling and analysis will demonstrate satisfaction of the goals. You have also notified us that implementation of this RAP probably won't commence for up to 3 years and also won't be completed until 14 months later due to clearance of the site by CPI, building demolition, and the time necessary to complete removals and/or remediation. Should this time schedule change, please keep us informed in a timely manner.

Please contact Steve Morse (tel: 510-622-2393 or e-mail: sim@rb2.swrcb.ca.gov) if you have any questions.

Sincerely,

/s/ Stephen I. Morse for Bruce H. Wolfe Executive Officer

cc: see interested persons list

Preserving, enhancing, and restoring the San Francisco Bay Area's waters for over 50 years



Interested Parties List for 301 Industrial Road Remedial Action Plan

RWQCB staff:

Stephen Hill Anders Lundgren Nancy Katyl

Joel Littman Communication and Power Industries, Inc. 811 Hansen Way Palo Alto, California 94303

Gary Kern Varian Medical Systems, Inc. 3100 Hansen Way Palo Alto, California 94304

Cecilia Montalvo Palo Alto Medical Foundation 795 El Camino Road Palo Alto, California 94301

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Brian Maura City of San Carlos 600 Elm Street San Carlos, California 94070

Patrick Ledesma
San Mateo County Environmental Health
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Barbara Cook, P.E., Chief Northern California – Coastal Cleanup Operations Branch Department of Toxic Substances Control 700 Heinz, Suite 200 Berkeley, California 94710 Jon K. Wactor, Esq. Wactor & Wick LLP 180 Grand Avenue, Suite 950 Oakland, CA 94612

Remedial Action Plan 301 Industrial Way San Carlos, California

June 16, 2004

Prepared For:
301 Industrial LLC
3629 Grand Avenue
Oakland, California 94610

Prepared By:
Northgate Environmental Management, Inc.
3629 Grand Avenue
Oakland, California 94610

CERTIFICATION

All engineering information, conclusions, and recommendations in this Remedial Action Plan have been prepared under the supervision of and reviewed by a California Registered Professional Engineer.

Alan Leavitt

Certified Engineer (C-049319)

Date 6/16/2004

TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	SITE BACKGROUND	2
2.1	SITE DESCRIPTION	2
2.2	SITE HISTORY	
2.3	SITE GEOLOGY AND HYDROGEOLOGY	
3.0	SUMMARY OF PREVIOUS INVESTIGATIONS	5
4.0	REMEDIATION ZONES	7
4.1	CRITERIA FOR REMEDIATION	7
4.	1.1 Tier 2 Risk Assessment	
4.	1.2 Proposed Remedial Goals	
4.2	KNOWN AREAS OF CONCERN	
4.	2.1 Former Ceramics Plating Shop/Sump Area	
4.	2.2 Former Chemical Kitchen Area	
4.	2.3 SWMU 11 Area	
4.	2.4 Former TCA Tank and Drum Storage Area	9
4.	2.5 Former Gasoline UST Excavation Area	
4.	2.6 Transformer Area	. 10
4.	2.7 Hazardous Waste Storage Area	. 10
4.	2.8 Former Evaporation Ponds Area	
5.0	PROPOSED REMEDIAL APPROACH	. 11
5.1	DESCRIPTION	. 11
5.	1.1 Excavation, Treatment, and Disposal of Contaminated Soil	
5.	1.2 Dewatering of Excavation Areas and Treatment of Contaminated Groundwater	. 12
5.	1.3 In Situ Treatment of Residual VOCs	
5.2	SCHEDULE	. 13
6.0	REFERENCES	. 14

TABLES

- 1. Summary of AOCs and SWMUs
- 2. Proposed Remedial Goals for Soil
- 3. Proposed Remedial Goals for Groundwater
- 4. Proposed Remedial Goals for Soil Gas
- 5. Summary of Known Areas of Concern and Remedial Approach
- 6. Sampling Plan

FIGURES

- 1. Site Location
- 2. Site Plan
- 3. Proposed Remediation Zones
- 4. Former Ceramics Plating Shop Area
- 5. Former Chemical Kitchen Area
- 6. SWMU 11 Area
- 7. Former TCA Tank and Drum Storage Area
- 8. Former Gasoline UST Excavation Area
- 9. Transformer Area
- 10. Hazardous Materials Storage Area
- 11. Former Evaporation Pond Area
- 12. Typical Excavation and Backfill Cross-Section

APPENDICES

- A. Regulatory Approval Letters
- B. List of Reports

1.0 INTRODUCTION

Northgate Environmental Management, Inc. (Northgate) has prepared this remedial action plan (RAP) on behalf of 301 Industrial LLC (301) for the Communications and Power Industries (CPI) property located at 301 Industrial Way, in San Carlos, California (the "Site"; see Figure 1). CPI currently owns the Site, and operates a manufacturing facility at this location for the production of electrical components. Prior to CPI's ownership of the Site, Varian Associates, Inc. (Varian) also used the Site to manufacture electrical equipment.

Chemicals are known to be present in soil and groundwater at the Site, but at concentrations below the current approved cleanup goals for industrial use of the property. 301 proposes to acquire the Site for the construction and operation of a hospital and medical facility. Additional cleanup activities would be performed before this change in land use. The objective of this RAP is to describe the proposed remediation plan to be implemented prior to redevelopment of the Site for Unrestricted Uses. "Unrestricted Uses" refers to residential housing, child facilities (e.g., daycare, K-12 schools, preschools, playgrounds), elderly facilities (e.g., nursing homes, hospices, convalescent homes, senior centers, assisted living facilities), places of worship, hotels/motels, hospitals, skilled nursing and medical facilities, and similar sensitive receptors.

The California Regional Water Quality Control Board (RWQCB), California Department of Toxic Substances Control (DTSC), and San Mateo County Environmental Health Division (County) have previously overseen extensive environmental investigation, remediation, and facility closure activities at the Site. Northgate anticipates that the RWQCB will serve as lead agency to oversee implementation of this RAP, with review and concurrence by DTSC and the County.

2.0 SITE BACKGROUND

2.1 Site Description

The Site encompasses approximately 18.5 acres. The property is located between Highway 101 (to the east) and Industrial Way (to the west) as shown in Figure 1. Currently, the Site includes four main buildings (identified as Buildings 1, 2, 3, and 5), a wastewater treatment facility, hazardous waste storage area, other smaller structures, and parking lots (see Figure 2). The following description of CPI's facilities is based on information obtained from P&D Consultants (P&D) Phase I Site Assessment (2000). CPI will update the facility description when it performs a pre-closure facility audit to identify: (1) chemical, waste and equipment inventories; (2) the proposed disposition of those chemicals, waste, and equipment; (3) locations on the property where hazardous materials, substances, or wastes are known to have been stored, used, or generated at the facility by CPI, Varian, and others; and (4) a proposed sampling program.

Building 1 is or was used for manufacturing processes, including cutting and machining of metals, plating, degreasing, and winding of power tubes. Other portions of Building 1 include offices, laboratories, shipping and receiving area, clean rooms, and a cafeteria.

Building 2 contains or contained a machine shop, including cutting, machining, and degreasing of metals, parts department, and office space.

Building 3 is or was used for manufacturing operations similar to Building 1.

Building 4 was not constructed.

Building 5 is or was used for storage of supplies and maintenance equipment, and houses an electronic repair shop.

The Hazardous Materials Storage Area includes three sheds used to store chemicals, including products and wastes. These sheds include bermed and sloped floors that provide a secondary containment system for drummed materials stored within.

The industrial wastewater treatment facility is located northwest of Building 1. Historically, the system treated the following wastes containing dissolved metals: concentrated acids and cyanide solutions, as well as acid and cyanide solution rinse waters. The system is used to treat plating

process wastewater, including acid waste rinse water containing dissolved metals (e.g., primarily copper and nickel with trace concentrations of silver and gold) and cyanides. Treated wastewater is discharged to the municipal sewer system.

2.2 Site History

The site was first developed in the mid-to-late 1950s as an industrial facility for the manufacturing of electronic components, including ceramic/metal power grid tubes and cavities. The 1961 Sanborn map identifies the site occupant as Eitel-McCullough Inc. (EIMAC), a company reportedly acquired by Varian in 1965. Varian continued to manufacture electronic components at the Site.

In 1980, Varian submitted a Part A application to DTSC for a permit to store hazardous wastes, including solvents, acids, bases, cyanides, and polychlorinated biphenyl (PCB) wastes, and to treat wastewater generated at the Site. The DTSC granted interim status to Varian for these units in 1981, and issued a hazardous waste facility permit to Varian in 1983. Varian continued to operate these facilities at the Site, pursuant to permits issued by the DTSC until 1995. At that time, Varian sold the EIMAC division to CPI, and transferred its hazardous waste facility permit to CPI. CPI closed the hazardous waste facility permit and operated its waste management units pursuant to permit-by-rule requirements. DTSC's letters approving CPI's previous closure activities and rescinding the RCRA permit are included as Appendix A to this RAP. CPI has continued to manufacture vacuum tubes and related electrical components at this location. CPI's activities include manufacturing and testing power tubes, research and design of power tube equipment, and shipping/receiving activities. The manufacturing processes include cutting and machining metal components, plating, degreasing, and testing the power tubes.

In addition to DTSC's requirements for management of hazardous wastes, CPI's manufacturing activities are subject to regulation by the County, RWQCB, Bay Area Air Quality Management District (BAAQMD), and South Bayside System Authority (local sanitation district).

2.3 Site Geology and Hydrogeology

The Site is generally flat, with an elevation of approximately 5 feet above mean sea level. The ground surface slopes slightly towards the east. Based on Northgate's review of boring logs from the Site, the upper 5 to 6 feet of soil consist primarily of fill material, comprised of clayey sand to sandy clay with some gravel. This fill overlies the former marshland soils, commonly referred to as Younger Bay Mud.

The closest surface water body is Phelps Slough, located about 300 feet to the east of the Site. Phelps Slough drains to Steinberger Slough, which drains to San Francisco Bay. The depth to groundwater at the Site is typically about 6 to 10 feet below the ground surface (bgs). A shallow discontinuous water-bearing zone exists beneath the Site in the fill above the Bay Muds. Water gradients are relatively low with variable flow directions across the Site.

3.0 SUMMARY OF PREVIOUS INVESTIGATIONS

Northgate has assessed soil and groundwater contamination at the Site based on a review of previous environmental investigations, site assessments, closure reports, and recent soil and groundwater sampling programs for the Site. These activities and findings are summarized below.

From 1984 to the present, numerous environmental investigations have been performed to assess soil and groundwater quality at the known chemical handling areas of the Site. A partial list of these reports is included in Appendix B. Between 1984 and 1994, environmental investigations and monitoring activities were performed by Metcalf & Eddy, Kennedy/Jenks, Law Associates, Canonie Environmental, and Woodward-Clyde Consultants (see Appendix B).

In 1994, the DTSC completed a RCRA Facility Assessment (RFA) for the Site. The RFA identified 24 Solid Waste Management Units (SWMUs) and 18 Areas of Concern (AOC) at the Site. Varian subsequently completed extensive soil and groundwater investigations at the Site in response to the RFA. These activities were completed between 1994 and 1997, as described in the following documents:

- RCRA Facility Assessment for Varian Power Grid Tube Products (California Environmental Protection Agency, Department of Toxic Substances Control--Region 2, 1994)
- Phase I Environmental Site Assessment of Varian Power Grid Tube Products DRAFT FINAL (Montgomery Watson, 1995a)
- RCRA Facility Investigation Final Report and Summary Report Varian Power Grid Tube Products (Montgomery Watson, 1995b)
- Final Report of Results Additional Field Investigation Former Varian Power Grid Tube Products (Montgomery Watson, 1996a
- Human Health Risk Assessment Former Bldg 2 Drum Storage Area (Montgomery Watson, 1996b)

Following completion of the RFA work, CPI closed its hazardous waste facility permit, as described in a report entitled *Closure Report of Hazardous Waste Storage Area* (Aqua Science Engineers, 1997).

These investigations indicated that contamination was localized in soil and shallow groundwater, with limited potential for migration beyond the apparent source areas. Varian obtained regulatory approvals to close all AOCs and the inactive SWMUs without further action, providing that the site continued to be used for industrial purposes. No further action was required for active SWMUs, which were to be addressed during facility closure (including SWMU 20, the sludge bin area, hazardous waste storage sheds, and wastewater treatment area). A detailed summary of the history of the SWMUs and AOCs, along with their current regulatory status, is provided in Table 1. As noted in this table, eight areas of the site have been remediated under the oversight of the RWQCB, DTSC, and the County.

4.0 REMEDIATION ZONES

4.1 Criteria for Remediation

4.1.1 Tier 2 Risk Assessment

The proposed remedial goals for the Site are based on the Tier 2 Environmental Screening Levels (ESLs) established by the RWQCB (RWQCB, 2003a and b). The ESLs have been selected as these values would be health-protective for Unrestricted Uses, as previously defined. According to the RWQCB, the presence of a chemical in soil, soil gas, or groundwater at concentrations below the corresponding ESL can be assumed to not pose a significant, long-term threat to human health and the environment. A post-remediation risk assessment will be conducted following the remediation of soils and groundwater at the Site to assess potential health risks, if any, related to residual concentrations of chemicals detected at the Site.

In order to select the appropriate ESLs, the following steps have been completed:

- Identify the chemicals of potential concern and types of impacted media
- Determine the site-specific use of the land and the potential exposure pathways

The chemicals of potential concern identified at the Site include chlorinated hydrocarbons, petroleum hydrocarbons, and metals. These chemicals have been identified in soil and groundwater. Additionally, chlorinated hydrocarbons and petroleum hydrocarbons have been detected in soil gas at the Site.

Cleanup goals will be based on achieving the Unrestricted Uses standard. Based on planned response actions, it is anticipated that institutional controls (including deed restrictions) and/or engineering controls will not be necessary. Potential future exposure pathways may include inhalation via indoor air by occupants and direct exposure to soil by construction workers. No other potential exposure pathways have been identified for human or ecological receptors. No beneficial uses have been identified for groundwater as the total dissolved solids in groundwater is greater than 3,000 micrograms per liter (mg/l) and the shallow water-bearing unit (i.e., primarily young Bay Mud) is not sufficiently permeable to yield usable quantities of groundwater. No ecological receptors are present at the site, or in the vicinity of the site. Therefore, ESLs were considered only for direct exposure, inhalation via indoor air, and general resource degradation (ceiling values or leaching to groundwater).

4.1.2 Proposed Remedial Goals

The proposed remedial goals were selected to achieve Unrestricted Uses by using the most conservative ESL for each chemical of potential concern in each impacted media. Table 2 summarizes the ESLs and proposed remedial goals for volatile organic compounds (VOCs), metals, and other chemicals in soil. In the case of certain metals (arsenic, cadmium, chromium, and thallium), the proposed remedial goals are based on the estimated background concentrations for the Site vicinity. Table 3 summarizes the ESLs and proposed remedial goals for VOCs, metals, and other chemicals in groundwater. Table 4 summarizes the proposed remedial goals for VOCs in soil gas.

4.2 Known Areas of Concern

The proposed remedial goals were compared to the reported concentrations of chemicals detected in soil, soil gas, and groundwater from previous investigations, identifying areas of the Site requiring remediation, and defining the approximate extent of affected media. Although potential exposure point concentrations could be estimated using 95% upper confidence limits or other statistics, the proposed remediation areas have been defined by comparing the concentrations at individual sample locations to the proposed remedial goals. The actual excavation areas and depths will be determined based on additional field observations and laboratory analyses of samples collected during RAP implementation.

Northgate has identified eight areas of the Site where remediation is proposed, as shown on Figure 3. These areas are summarized below and described in detail in Table 5.

4.2.1 Former Ceramics Plating Shop/Sump Area

This portion of the Site was located in Building 1. The impacted area includes AOC 16, which represents the former ceramics plating shop, and SWMU 15, which refers to the former plating waste sump (see Figure 4). As summarized in Table 1, these areas were conditionally closed based on industrial cleanup goals, with no further action pending future changes in land use. Elevated levels of nickel are present in soil and groundwater in the vicinity of the former ceramics plating shop and sump.

4.2.2 Former Chemical Kitchen Area

This portion of the Site is located in Building 1. The impacted area includes AOC 14, which represents the former chemical kitchen (see Figure 5). As summarized in Table 1, this area was conditionally closed based on industrial cleanup goals, with no further action pending future changes in land use. Elevated levels of VOCs including TCE, PCE, vinyl chloride, cis-1,2-DCE, and 1,1-DCA are present in soil and groundwater in the vicinity of the former chemical kitchen.

4.2.3 SWMU 11 Area

This area is associated with a former 750-gallon concrete sump in Building 1 (see Figure 6). This sump was used to contain plating water. SWMU 11 was identified in the RFA and subsequently closed based on industrial cleanup goals, with no further action, pending future changes in land use. Metals and cyanide were detected in soil in this area. More recent sampling for VOCs indicated the presence of TCE in soil and groundwater, and vinyl chloride in shallow groundwater in the vicinity of this former SWMU.

4.2.4 Former TCA Tank and Drum Storage Area

This area is located along the east sidewall of Building 2. The impacted area includes AOC 11, which represents the 1,1,1-TCA storage tanks, and SWMU 15, which refers to the former drum storage area (see Figure 7). As summarized in Table 1, these areas were subject to previous remediation and conditionally closed based on industrial cleanup goals, with no further action pending future changes in land use. Elevated levels of VOCs, including TCE, PCE, vinyl chloride, 1,1-DCE, and 1,1-DCA are present in soil and groundwater in the vicinity of the 1,1,1-TCA storage tanks and former drum storage area.

4.2.5 Former Gasoline UST Excavation Area

This area is located outside the southwestern corner of Building 1. The impacted area includes AOC 1, which represents a former underground storage tank (UST) that was used to store gasoline (see Figure 8). Leakage from the UST was detected and remediated in the mid-1980s, as discussed in the DTSC's RFA (DTSC, 1994). As summarized in Table 1, this area was closed and the UST was removed. Elevated levels of VOCs, including benzene, toluene, ethylbenzene, and xylenes, and total petroleum hydrocarbons as gasoline (TPH-gasoline) are present in soil and groundwater in the vicinity of the former UST.

4.2.6 Transformer Area

This area is located on the northwest side of Building 3, in the vicinity of transformers and associated oil tanks and piping (see Figure 9). This area was never identified as an AOC or SWMU in the RFA. However, PCBs and TPH have been detected in shallow soil in a localized portion of this area.

4.2.7 Hazardous Waste Storage Area

This area consists of three storage sheds located north of Building 5 (see Figure 10). This portion of the Site was formerly permitted as a hazardous waste storage area. Although this facility was closed, it continues to be used for storing hazardous materials and wastes. VOCs, including TCE and PCE, have been detected in soil in and around storage sheds B and C.

4.2.8 Former Evaporation Ponds Area

This portion of the Site is located west of Building 2, and was temporarily used for an industrial wastewater treatment facility, including three sludge evaporation ponds (see Figure 11). Sludge generated by the wastewater treatment facility was temporarily stored in these evaporation ponds. As summarized in Table 1, this area (referred to as SWMU 4), was remediated and closed. Elevated levels of chromium remain in soil at this portion of the Site.

5.0 PROPOSED REMEDIAL APPROACH

5.1 Description

Remedial activities will be performed after CPI closes its hazardous material facilities, and the existing buildings and other Site improvements have been demolished and removed from the Site. Varian owns the existing monitoring wells at the Site, and will properly abandon its wells in accordance with state and local requirements, prior to 301 gaining title to or remediating the Site.

The proposed remedy includes three primary components, as follows:

- Excavation, treatment, or disposal of contaminated soil
- Dewatering/treatment of contaminated groundwater, as necessary
- In situ treatment of residual organic compounds, if necessary

These remedial components are proven technologies that can be readily implemented at the Site as summarized below. Table 5 describes where these technologies are proposed for specific remediation zones at the Site.

5.1.1 Excavation, Treatment, and Disposal of Contaminated Soil

Soil containing chemicals of concern above the remedial goals (or above background concentrations, in the case of metals) will be excavated. This remedial component will apply to both unsaturated- and saturated-zone soils. On average, the unsaturated-zone soils consist of fill that extend to 6 feet bgs; the saturated-zone soil generally consists of Bay Mud. Depending on the extent of contamination, excavations are planned to range from approximately 4 to 12 feet bgs. It is anticipated that excavation areas will be sloped approximately 2 to 1 (horizontal to vertical) to maintain stable slopes. The actual excavation areas and depths will be determined based on field observations (e.g., evidence of discolored or stained soil, PID measurements of soil samples, etc.) and laboratory analyses of soil samples from the sidewalls and bottom of excavation pits and groundwater re-entering excavation pits (as outlined in Table 6) for metals and VOCs. Laboratory analyses of soil samples from the sidewalls and bottom of excavation pits and groundwater re-entering excavation pits for metals and VOCs and post-excavation soil gas sampling (see Table 6) for VOCs will be used to confirm that the contaminated soil has been appropriately cleaned up. Excavated soil will be segregated and stockpiled for chemical analyses.

Soil containing chemicals at concentrations above the remedial goals will be disposed at an appropriate permitted off-site facility. Alternatively, soil may be treated onsite by aeration or biodegradation, in accordance with BAAQMD regulations. Each excavation pit will be sampled prior to backfilling to confirm that soil cleanup criteria have been achieved. Additional soil may be excavated, or other remedial measures will be performed if necessary, to achieve remedial goals as discussed below. Excavated soil that does not contain chemical concentrations above the remedial goals (e.g., overburden soils and cut slopes) will be reused to backfill excavation areas.

5.1.2 Dewatering of Excavation Areas and Treatment of Contaminated Groundwater

Remediation areas that extend into the saturated zone may be kept open for a period of several days to several weeks, to provide the opportunity for groundwater to seep into the excavations. The purpose of this step is to remove additional chemicals of concern that are potentially present in the discontinuous water-bearing zones adjacent to the excavation boundaries. Following the completion of excavation, water entering the excavations will be tested (as outlined in Table 6) for those chemicals exceeding remedial goals for the excavated soil and reviewed to determine if additional excavation is required. Water that is pumped out of the excavations will be treated, as necessary, prior to onsite discharge (i.e., to sanitary sewer or storm drain via discharge permits) or hauled to an approved offsite facility for treatment or disposal.

5.1.3 In Situ Treatment of Residual VOCs

In the event that remedial goals cannot be entirely achieved through the excavation and dewatering activities described above, remaining chemicals that are biodegradable may be treated in situ with enhanced bioremediation technologies. Hydrogen donors (e.g., lactate, cheese whey, or other readily degradable carbon sources) may be added to the saturated zone to stimulate the naturally-occurring soil microorganisms to break down chlorinated hydrocarbons to non-toxic substances. Oxidants could also be added to stimulate the rapid degradation of petroleum hydrocarbons. While the above technologies are well-established, a treatability study may be conducted to select the most effective chemicals for enhanced bioremediation of residual chemicals of concern.

As previously noted, most of the shallow saturated zone soil is composed of low permeable Bay Mud. If in situ treatment is selected as a remedial component for selected areas, an engineered permeable layer may be constructed in the excavation, prior to backfilling, to facilitate delivery of hydrogen donors and/or oxidants to the affected zones. The engineered permeable layer (e.g., Class II permeable fill) would be placed along the sides of the excavation pit and a horizontal layer placed at the Bay Mud/native fill interface (see Figure 12). The remaining excavation areas

will be backfilled with clean Bay Mud or other clean backfill. The engineered permeable layer will allow for subsequent additions of hydrogen donor and/or oxidants, if necessary to enhance the degradation of chemicals of concern in the saturated zone.

If an in situ technology is used to treat saturated zone soil or groundwater, then the confirmation sampling plan in Table 6 will be modified to include soil gas and groundwater monitoring. Such monitoring will be conducted following backfilling and will include sampling both from within the engineered permeable layer and laterally on all sides at an appropriate distance from the edge of the engineered permeable layer. All sampling and analytical methods used will have sufficient sensitivity to confirm whether or not remedial goals have been achieved.

5.2 Schedule

CPI will be re-locating its operation from the Site over the next 24 months, including the closure and decommissioning of its facilities. Following RWQCB approval of this RAP and the acquisition of local permits, Varian will abandon its existing monitoring wells at the Site. Remedial activities are expected to be completed within 12 to 18 months following demolition and removal of Site structures. Remedial activities may be phased in conjunction with CPI's closure and demolition schedule. After source areas are excavated and dewatered, residual chemicals may be treated in situ, if necessary, to achieve the remedial goals. 301 will provide a more detailed schedule to the RWQCB prior to commencement of remediation, and will update the RWQCB periodically on progress implementing the RAP.

6.0 REFERENCES

- Aqua Science Engineers. 1997. Closure Report of Hazardous Waste Storage Area. December.
- California Environmental Protection Agency, Department of Toxic Substances Control, Region 2. 1994. RCRA Facility Assessment for Varian Power Grid Tube Products. June.
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- P & D Consultants. 2000. Expanded Phase I Environmental Site Assessment. October.

Table 1

Summary of AOCs and SWMUs

Area of Concern	His	History	Current Regulatory Status
SWMU 1: Former Drum Storage	•	Installed in 1960s	 No further action recommended by
Area	•	Asphalt area with sandbag berms; sloped to the north	DTSC (RFA 1994)
	•	Located in an open area in the northeast corner of the facility	
	•	Potassium evanide, silver evanide, alcohols, acetone, PCE, TCE, acidic solutions w/metals.	
		PCBs, waste oils, asbestos, nitrocellulose; majority of wastes in 55 gallon drums	
	•	Reported releases of waste xvlene, waste acetone, and waste etching solution	
	. •	Closed by the DTSC in 1985	
SWMU 2: Solvent Pit	•	Installed in early 1960s	No further action recommended by
	•	10-inch augered, gravel-filled hole, unlined	DTSC (RFA 1994)
	•	Located south of the former wastewater treatment system	
	•	Reported releases of 500 to 600 gallons of waste acetone containing barium carbonate and a	
		methanol-rhodamine dye	
	•	Abandoned shortly after installation due to poor percolation rates	
	•	Contaminated soil was excavated and disposed off-site by Varian	
	•	Closed by the DTSC in 1985	
SWMU 3: Acid Pits	•	Installed in 1962	No further action recommended by
	•	(2) 6-foot diameter pits	DTSC (RFA 1994)
	•	Located at the southeast corner of the hazardous waste storage sheds	
	•	Reported releases of 500 gallons of acid waste metal plating solutions containing principally	
		copper and nickel	
	•	Failed to percolate	
	•	Closed in 1963 and backfilled	
		Paved and hazardous waste storage shed built over location	
SWMU 4: Former Wastewater	•	Installed in 1970s	 No further action recommended by
Treatment Area	•	System consisted of a neutralization tank, (2) settling pools, (2) concentrated acid storage tanks,	DTSC (RFA 1994)
		and a 30% sodium hydroxide tank for neutralizing and removing metals from wastewater	 Additional remediation necessary
	•	From 1976 to 1982, sludge generated by the wastewater treatment facility was stored in (3)	to meet cleanup goals for
		evaporation ponds, ponds were replaced in 1982 by a sludge thickening tanks and filter press	unrestricted land use
	•	Located east of the existing wastewater treatment facility	
	•	Numerous releases reported	
	•	Contaminated soil in the evaporation pond area was excavated and disposed off-site by Varian in	
	•	Evanoration nond area closed in 1985	
	•	System closed by the DTSC; date unknown	
SWMU 5. Waste Methanol Tank	•	see AOC 3	No further action recommended by DTSC (RFA 1994)
SWMU 6: Chrome System	•	Installed in 1985	No further action recommended by
	•	System consisted of an acid/chromate holding tank, a chrome reduction tank, and a sodium	DTSC (RFA 1994)
		metabisulfite tank	
	•	Located in the existing wastewater treatment facility in the area currently occurpied by the	
	_ (deionization system Closed by the DTCC in 1001	
	•	Clusted by the D13C III 1771	and the sealer of the sealer o

Table 1 Summary of AOCs and SWMUs

Area of Concern	History	A.io	Current Regulatory Status
CWMII7. 60 Collon Congrete	L	1	N. C. charles and the second s
Waste Sump w/PVC Lining for	• •	Installed in 1970 Concrete vanit with PVC liner north of Building 1 between Building 1 and 2	DTSC (Response to RFI 1995)
Process Wastewater	•	Collected treated and transferred cyanide wastewaters (including conner and silver cyanides)	
		sodium hypochlorite used to treat cyanides prior to pumping to the former wastewater treatment	
		system	
	•	Closed in 1985 following the construction of the existing wastewater treatment system	
	•	Additional investigation recommended by DTSC per 1994 RFA	
	•	RCRA Facility Investigation conducted in 1995	
SWMU 8: 800-Gallon Concrete	•	Installed in 1979	No further action recommended by
Waste Sump for Acid Wastewater	•	Concrete vault with rubber/epoxy liner in Building 1	DTSC (RFA 1994)
	•	Collected and transferred acidic wastewater containing metals (including hydrochloric, nitric, and	
		sulfuric acids containing copper, nickel, iron, cobalt, tungsten, molybdenum, and aluminum	
	•	Closed in 1986 by the SMCDHS	
SWMU 9: 30-Gallon Concrete	•	Installed around 1962	 No further action recommended by
Waste Sump for Process	•	Concrete vault with PP liner in the west end of Building 1	DTSC (RFA 1994)
Wastewater w/Acetone	•	Collected and transferred wastewater (including acetone and acidic solutions w/metals including	
		copper, nickel, and chromium)	
0 00 00 0111	•	CLOSED IN 1700 by the SMICLPHS	
SWMU 10: 90-Gallon Concrete	•	Installed around 1964	No further action recommended by
Waste Sump for Acidic	•	Concrete vault with PP liner in the northeast end of Building 1	DTSC (RFA 1994)
Wastewater w/Metals	•	Collected and transferred wastewater (including hydrochloric, nitric, and sulfuric acid solutions	•
		containing primarily nickel)	
	•	Closed in 1985 the SMCDHS	
SWMU 11: 750-Gallon Concrete	•	Installed around 1960	 No further action recommended by
Waste Sump for Acidic	•	Concrete vault with PP liner in the center of Building 1	DTSC (Response to RFI 1995)
Wastewater w/Metals	•	Collected and transferred wastewater (including cyanide and acidic solutions w/metals including	Additional remediation necessary
		copper, nickel, silver, iron, and cobalt)	to meet cleanup goals for
-	•	Closed in 1976	unrestricted land use
-	•	Additional investigation recommended by DTSC per 1994 RFA	
	٠	RCRA Facility Investigation conducted in 1995	
SWMU 12: 140-Gallon Concrete	•	Installed around 1960	 No further action recommended by
Waste Sump for Treated Process	•	Concrete vault lined with tar adjacent to the outside north wall of Building 1	DTSC (Response to RFI 1995)
Wastewater	•	Collected and transferred wastewater from a zirconium coating operation	
	•	Closed in 1985	
	•	Additional investigation recommended by DTSC per 1994 RFA	
	•	RCRA Facility Investigation conducted in 1995	
SWMU 13: 250-Gallon Dual	•	Installed in 1960s	No further action recommended by
Chamber Concrete waste sump	•	Concrete vault with PVC liner and transfer tanks adjacent to the outside north wall of Building 1	D1SC (Response to KFI 1995)
Westernsters w/Metals	•	Collects and transfers cyanide of acid wastes w/metals	
Wastewaters Windians	•	Numerous releases reported	
	•	Replaced with existing sump system in the early 1980s	
	•	Additional impediant and add by DESC and 1004 PEA	
	• •	Additional investigation recommended by D13C per 1994 KFA PCD A Equiliar Investigation conducted in 1005	
		NCAS (aciny investgation conducted in 1775	

June 16, 2004

Area of Concern	His	History	Current Regulatory Status	
SWMU 14: 800-Gallon Dual	•	Installed in 1976	No further action recommended by	by
Chamber Concrete Waste Sump	•	Concrete vault with PVC liner and transfer tanks adjacent to the outside north wall of Building 1	DTSC (Response to RFI 1995)	
for Acidic/Cyanide Wastewaters	•	Collected and transferred acid and cvanide w/metals	Closure letter from SMCDHS in	
w/Metals	•	Numerous releases reported	1995	-
	•	Additional investigation recommended by DTSC per 1994 RFA		
	•	RCRA Facility Investigation conducted in 1995		
SWMU 15: Epoxy Coated	•	Installed around 1965	 Closure letter from SMCDHS in 	
Concrete Waste Sump w/PVC	•	Concrete vault and transfer tank located adjacent to the Former Ceramics Plating Shop	1995	
Liner for Acidic Wastewaters	•	Collected and transferred acidic metal wastes including nickel, nickel alloys, copper,		
w/Metals		molybdenum, and chromium		-
	•	Additional investigation recommended by DTSC per 1994 RFA, conducted in 1995		
SWMU 16: Former Drum Storage	•	see AOC 11	 No further action until land use 	
Area	٠	Additional investigation recommended by DTSC per 1994 RFA	changes per RWQCB (Closure letter	etter
			in 1997)	
			 Additional remediation necessary 	ary
			to meet cleanup goals for unrestricted land use	
SWMU 17: Former Scrap Metal	•	Installed around 1960	 No further action recommended by 	by
& Oil Coolant Storage Area	•	Fenced area for storing drums located west of Building 2	DTSC (RFA 1994)	-
	•	Metal turnings, scrap metal, waste coolants and oil		
	•	Closed in 1982		
	•	Varian excavated oily soil and disposed at a Class I landfill		
SWMU 18: Scrap Metal Bin Area	•	Installed in 1960s	No further action recommended by	by
	•	Area south of SWMU I	DTSC (RFA 1994)	
	•	Scrap metals (may have contained some oil)		
	٠.	Closed in 1981		
	•	Varian excavated all visibly contaminated soil and disposed at a Class I landfill		
SWMU 19: 1,000-Gallon Waste	•	Installed in 1976	 No further action recommended by 	by
Concentrated Acid Storage Tank	•	PP tank located adjacent to SWMU 14	DTSC (RFA 1994)	
	•	Collected concentrated acidic metal wastes		
	•	Numerous releases reported		
	•	Remedial measures included flushing and collecting storm drain contents and excavation of		
		contaminated soil		
to the company of the	•	Closed in 1985		
SWMU 20: 300-Gallon Concrete	•	Installed in 1965	 To be closed under the SMCDHS 	S
Waste Sump for Process	•	Concrete vault	when operation ceases (RFA 1994)	
Wastewater w/Copper	•	Collects and transfers wastewater w/metals		
	•	Currently in use		
SWMU 21: Sludge Bin Area	•	Installed in 1982	 To be addressed during closure of the 	of the
	. •	Contains dumpster to store sludge removed from the WWTP	facility (RFA 1994)	
	•	Sludge primarily contains copper, nickel, iron, and silver		
	•	Currently in use		

June 16, 2004

Table 1
Summary of AOCs and SWMUs

Area of Concern	History	ory	Current Regulatory Status
SWMU 22: Wastewater Transfer	•	Installed in 1991	 No further action (RFA 1994)
Sumps	•	Coated concrete vaults and tanks	
	•	Collection tanks for concentrated cyanide, dilute cyanide, and acidic metal wastes	
	•	Currently in use	
SWMU 23: Hazardous Waste	•	Installed in 1983	 To be addressed during closure of the
Storage Sheds	•	Three sheds for chemical storage	facility (RFA 1994)
	•	Acids, bases, solvents, cyanides, oils, and more	 Additional remediation necessary
	•	Currently in use	to meet cleanup goals for
**************************************			unrestricted land use
SWMU 24: Wastewater	•	Installed in 1984	 To be addressed during closure of the
Treatment Facility	•	System consists of (14) tanks and (1) filter press including cyanide destruction tanks, pH	facility (RFA 1994)
		adjustment tanks, a claritier tank, a sand filter tank, chemical storage tanks, waste storage tanks, a diversion tank a thickanar tank and a filtera collection tank	
	•	Treats wastewaters such as concentrated and dilute acidic and caustic solutions that contain	-
		metals along with concentrated and dilute cyanide solutions w/metals	
	•	Currently in use	
AOC 1: 1,000-Gallon Gasoline	•	Installed in 1976	 No further action recommended by
Tank	•	UST located outside the southwestern corner of Building 1	DTSC (RFA 1994)
	•	Potential gasoline leak identified in 1985	 Additional remediation necessary
	•	Closed and removed in 1985 under the SMCDHS	to meet cleanup goals for
	•	Aeration performed to reduce gasoline levels	unrestricted land use
AOC 2: 120-Gallon Gasoline	•	Installed in 1964	 No further action recommended by
Tank	•	UST located west of Building 1 near the western fence of the facility	DTSC (RFA 1994)
	•	Closed and removed in 1986 under the SMCDHS	
AOC 3: 3,000-Gallon Methanol	•	Installed in 1958	No further action recommended by
Tank	•	UST located adjacent to SWMU 5	DTSC (RFA 1994)
	•	Methanol in groundwater discovered in 1983	
	• •	Completed remediation of soil and groundwater contaminated with methanol under the RWQCB Closed in place in 1987	
AOC 4: Concentrated	•	Installed in early 1960s	No further action recommended by
Hydrochloric Acid Tank	•	AST located adjacent to the western fence of the facility	DTSC (RFA 1994)
	•	Bulk storage for concentrated hydrochloric acid	
	•	Numerous releases reported	
	•	Closed and removed in 1985	
AOC 5: 1,1,1-TCA Storage Tank	•	Installed around 1960	No further action recommended by
	•	AST located on the north wall of Building 1	DTSC (RFA 1994)
	•	TCA after 1976, may have been used for TCE prior to 1976	
	•	Closed and removed in 1992	-
AOC 6: 1,1,1-TCA Storage Tank	•	Installed around 1976	No further action recommended by
	•	AST located adjacent to the outside south wall of Building 3	D15C (RFA 1994)
	•	I.C.A storage plumbed to a degreaser Demonstrating 1986	
		NOTICE OF THE PARTY OF THE PART	

4 of 6

June 16, 2004

Table 1 Summary of AOCs and SWMUs

Ares of Concern	Histor	All Market and the second and the se	Current Regulatory Status	Status
AOC 7: Sodium Hydroxide	•	Installed in early 1960s	No further action	No further action recommended by
Storage Tank	•	Supplied sodium hydroxide to fume scrubbers and deionization system; located on roof of	DTSC (RFA 1994)	4)
		Building I		
	•	(2) releases reported Demonstrat in 1002		
AOC 8: Sodium Hydroxide	•	Installed in early 1960s	No further action	No further action recommended by
Storage Tank	•	Supplied sodium hydroxide to fume scrubbers and deionization system; located on roof of	DTSC (RFA 1994)	4)
		Building 2		
	•	Removed in 1992		
AOC 9: Nitric Acid Tank	٠	Installed around 1960	 No further action 	No further action recommended by
	•	Nitric acid plumbed to metal cleaning and plating operations, located on roof of building 1	DTSC (RFA 1994)	
	•	Closed and removed in 1985		
AOC 10: 1,1,1-TCA Storage Tank	•	Installed in 1991	 No further action 	No further action recommended by
	•	AST located next to SWMU 22 between Buildings 1 and 5	DTSC (RFA 1994)	4)
	•	TCA plumbed to degreasers		
	• -	(1) release and cleanup reported		,
	•	Currently in use		
AOC 11: Two 1,1,1-TCA Storage	•	Installed in 1960s	 No further action until land use 	until land use
Tanks	•	ASTs located adjacent to the outside east wall of Building 2 near SWMU 16	changes per RW	changes per RWQCB (Closure letter
	•,	TCA plumbed to degreasers; TCA after 1976; may have been used for TCE prior to 1976	in 1997)	
	•	Chlorinated solvents detected in soil following remediation of soil after a diesel spill in 1991	 Additional reme 	Additional remediation necessary
-	•	Currently in use	to meet cleanup goals for	goals for
	•	Additional investigation recommended by DTSC per 1994 RFA; conducted in 1995	unrestricted land use	d use
AOC 12: Acetone Storage Tank	•	Installed in early 1960s	 No further action 	No further action recommended by
	•	AST located inside shed west of Building 5	DTSC (RFA 1994)	-
	•	Removed in 1985		-
AOC 13. Anhydrous Ammonia	•	Installed in early 1960s	 No further action 	No further action recommended by
Storage Tank	•	AST located at the southwestern portion of the facility just inside the fence	DTSC (RFA 1994)	4)
	• '	Emptied and backfulled with nitrogen prior to 1984		
AOC 14: Former Chemical	•	Constructed around 1960	No further action until land use	until land use
Kitchen	•	Construction and plating operations located in the north end of Building 1	changes per RW	changes per RWOCB (Closure letter
	•	Wastewater flowed to SWMI 13	in 1996)	
	•	Additional investigation recommended by DTSC per 1994 RFA	Additional rem	Additional remediation necessary
	_		to meet cleanup goals for	goals for
			unrestricted land use	d use
AOC 15: Former Gold Room	•	Constructed around 1970	 No further action 	No further action recommended by
	•	Gold plating operation located in the north end of Building 1	DTSC (RFA 1994)	4)
	•	Wastewater flowed to SWMU 13		٠
	•	Closed in 1992	the state of the s	-

Area of Concern	Histor	bry	Current Regulatory Status
AOC 16: Former Ceramics Plate	•	Constructed around 1960	No further action until land use
Shop	•	Metal cleaning and plating operations in Building 1	changes by SMCDHS and RWQCB
	•	Wastewater flowed to SWMU 15	(Closure letter in 1996)
	•	Additional investigation recommended by DTSC per 1994 RFA	 Additional remediation necessary
	•	Additional Field Investigation conducted in 1996	to meet cleanup goals for unrestricted land use
AOC 17: Former Building 3 Plate	•	Constructed around 1976	 No further action recommended by
Shop	•	Metal cleaning and plating operations in Building 3	DTSC (RFA 1994)
	•	Wastewater flowed to SWMU 14	
	•	Closed in 1992	
AOC 18: Sump in Basement of	•	Constructed in 1961	No further action recommended by
Building 3	•	Located in basement of Building 3	DTSC (RFA 1994)
	•	Several releases reported including to storm drains	
	•	Currently in use	

June 16, 2004

Proposed Remedial Goals Soil

VOCs in Soil

	-					Chemical o	al of Potential Conc	em (mg/kg)						
RWOCE ESLS	TCE	PCE	Benzene	Toluene	Ethylbenzene	Total Xylenes	Vinyl Chloride	1,1,1-TCA	1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	trans-1,2-DCE
Tier 2 ESL, Residential Land Use, Direct Exposure ² , <10 ft bgs	2.9	0.48	0.18	130	8.7	54	0.025	43	0.7	2.8	24	0.35	8.5	14
Tier 2 ESL, Residential Land Use, Indoor Air 3	0.26	880.0	0.18	180	4.7	45	0.0067	98	0.033	0.33	8.9	0.025	1.6	3.1
Tier 2 ESL, Residential Land Use, Ceiling Level 4, <10 ft bgs	200	370	200	200	230	210	500	500	100	200	200	200	100	500
Tier 2 ESL, Soil Leaching Screening Level 5	33	- 11	2	9.3	32	1.5	0.68	7.8	4.9	1.9	4.3	1.8	18	38
Proposed Remedial Goal for VOCs in Soil	0.26	0.088	0.18	9.3	4.7	1.5	7900.0	7.8	0.033	0.33	4.3	0.025	9,1	. .

Metals in Soil

							Chemical or	f Potential C	oncern (mg/l)	(6)							
RWQCB ESLE'	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Wołybdenum	Nickel :	Selenium	Silver	Thallium \	fanadium	Zinc
Tier 2 ESL, Residential Land Use, Direct Exposure 2, <10 ft bgs	6.3	0.39	1100	31	1.7	85	94	630	255	2.5	78	310	78	78	-	110	4700
Tier 2 ESL, Residential Land Use, Ceiling Level 1, <10 ft bgs	1000	1000	1000	1000	1000	1000	1000	1000	1000	200	1000	1000	1000	1000	1000	1000	1000
Proposed Remedial Goal for Metals in Soil	6.3	19.1*	1000	31	2.7*	.9'66	94	630	255	2.5	78	310	78	78	27.1*	110	1000

Others in Soil

RWQCB ESLs1	Cyanide	Chemical of PCBs	2	tential Concern (mg/kg) TPH-G TPH-D	TPH-MO
Tier 2 ESL, Residential Land Use, Direct Exposure 2, <10 ft bgs	240	0.22	200	200	200
Tier 2 ESL, Residential Land Use, Ceiling Level 1, <10 ft bgs	100	200	100	200	200
Tier 2 ESL, Soil Leaching Screening Level ⁵	12000	6.3	400	005	900
Proposed Remedial Goal for Others in Soil	100	0.22	100	005	200

- 1 RWOCB ESLs taken from Screening from Environmental Concerns Af Sites With Contaminated Soil and Groundwater, Volumes 1 and 2, Interim Final July 2003 issued by the California Regional Water Quality Control Board San Francisco Bay Region 2 Table K-1 Direct Exposure Screening Levels Residential Exposure Screening Levels Residential Exposure Screening Levels Residential Exposure Screening Levels For Evaluation Of Potential Indoor-Air Impacts, Residential Exposure 6

 Table K-1 Direct Exposure Screening Levels For Evaluation Of Potential Indoor-Air Impacts, Residential Exposure 6

 Table M-2 Components for Shallow Soil Celling Cancers, Residential Centing Evel (Non-Dinking Water Resource)

 Table S. Soil Screening Levels For Leaching Goncorers, Soil Leaching Screening Level (Non-Dinking Water Resource)

 * proposed remedial goal is equivalent to Upper 95% Confidence Limit yealves for background soil concentrations, taken from Lawrence Berkeley National Laboratory Study, 1995

Proposed Remedial Goals for Groundwater

VOCs in Groundwater

						Chemic	al of Potential Co	incern (ug/l)						
AWGCB ESLS:	TCE	PCE	Benzene	Toluene	Ethylbenzene	Total Xylenes	Vinyl Chloride	1,1,1-TCA	1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	trans-1,2-DCE
Ter 2 ESL, Residential Land Use, Indoor Air ²	230	130	530	200000	14000	150000	4	130000	350	1000	6300	200	6200	6700
Ter 2 ESL, Residential Land Use, Ceiling Level	20000	3000	20000	400	300	2300	34000	20000	00005	20000	15000	20000	20000	2600
Proposed Remedial Goal for VOCs in Groundwater	530	130	230	400	300	2300	4	20000	350	1000	6300	200	6200	2600

Metals in Groundwater

Metals III Groundwater																	
-							Chemica	of Potentia	Concern (ug	(ya							
RWOCB ESL*	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Tier 2 ESL, Residential Land Use, Ceiling Level ³	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	50000	20000	20000	50000	20000	20000	20000
Proposed Remedial Goal for Metals in Groundwater	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	00005	20000	20000	20000	20000	50000

Others in Groundwater

2500	2500	2000	46	1700	Drange of Demandial Goal for Others in Groundwater
2500	2500	2000	16	1700	Tier 2 ESL, Residential Land Use, Ceiling Level ³
TPH-MO	TPH-D	9-Hdl	PCBs	Cyanide	RWGCB ESLS:
	ncern (ug/!)	of Potential Co	Chemical		

1 RWQCB ESIs taken from Screening from Environmental Concerns At Sites With Contaminated Soil and Groundwater, Volumes 1 and 2 Interim Final - July 2003 issued by the California Regional Water Quality Control Board - San Francisco Bay Region 2 Table E-1a Groundwater Screening Levels For Evaluation Of Potential Indoor-Air Impacts, Residential Land Use, High Permeability Vadose Zone Soil Type 3 Table 1-2 Groundwater Ceiling Levels

Proposed Remedial Goals for Soil Gas

VOCs in Soil Gas

l read dispersion						Chemical	of Potential Com	(em/gu) ma:						
KWUCH ENLS	ECE	PCE	Benzene	Toluene	Ethylbenzene	Total Xylenes	Vinyl Chloride	1,1,1-TCA	1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA c	is-1,2-DCE	rans-1,2-DCE
Tier 2 ESL, Residential Land Use, Indoor Air ²	1200	410	84	83000	2200	21000	31	46000	150	1500	42000	120	7300	15000
Proposed Remedial Goal for VOCs in Soil Gas	1200	410	84	83000	2200	21000	31	46000	150	1500	42000	120	7300	15000

1 RWACB ESLs taken from Screening from Environmental Concerns At Siles With Contaminated Soil and Groundwater, Volumes 1 and 2, Interim Final - July 2003 issued by the California Regional Water Quality Control Board - San Francisco Bay Region 2 Table E-2 Shallow Soil Gas Soil Screening Levels For Evaluation Of Potential Indoor-Air Impacts, Residential Exposure

Table 5 Summary of Known Areas of Concern and Remedial Approach

	osed remedial Class II n pit	sed remedial n pit ackfill along	sed remedial n pit ackfill along	sed remedial n pit
	(D) ial goals water above prop iss I (Cal Haz), or in open excavatié	(D) ial goals water above prop Class II landfill in open excavatic	D) ial goals water above prop Class II landfill in open excavati	D) ial goals water above prop Class II landfill in open excavati ass II permeable t
Proposed Mitigation Methods) x 105' (L) x 12' e proposed remecing soil or ground ass I (RCRA), Cl nt of groundwater	A) x 83' (L) x 12' e proposed remeding soil or ground ass I (Cal Haz) or nt of groundwater donor in a Cl	') x 67' (L) x 12' · e proposed remecing soil or grouncling soil or grouncling soil or ground on to figure and on or in a Cl	') x 43' (L) x 12' 'e proposed remec ing soil or grounc lass I (Cal Haz) or int of groundwate; ogen donor in a C
Proposed Mi	nensions of 84' (W uturated zone abov rated zone contai s necessary at a C nd ex-situ treatm	tensions of 163' (iturated zone aborated zone contain s necessary at a C nd ex-situ treatmo nd ex-situ treatmo lication of a hydri kfili injections.	rensions of 95' (Waturated zone aborrated zone contain rated zone contain decessary at a C and ex-situ treatmulcation of a hydr hication of a hydr kfill tinjections.	rensions of 70' (V sturated zone abor rated zone contail s necessary at a C und ex-situ freatm ilication of a hydr kfill injections.
	Estimated excavation dimensions of 84° (W) x 105° (L) x 12° (D) Excavation of soil in unsaturated zone above proposed remedial goals Excavation of soil in saturated zone containing soil or groundwater above proposed remedial goals Off-site disposal of soil as necessary at a Class I (RCRA), Class I (Cal Haz), or Class II andfill Groundwater extraction and ex-situ treatment of groundwater in open excavation pit Backfill	Estimated excavation dimensions of 163' (W) x 83' (L) x 12' (D) Excavation of soil in unsaturated zone above proposed remedial goals Excavation of soil in saturated zone containing soil or groundwater above proposed remedial goals Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill Groundwater extraction and ex-situ treatment of groundwater in open excavation pit If necessary, open pit application of a hydrogen donor in a Class II permeable backfill along with subsequent post-backfill injections.	Estimated excavation dimensions of 95' (W) \times 67' (L) \times 12' (D) Excavation of soil in unsaturated zone above proposed remedial goals Excavation of soil in saturated zone containing soil or groundwater above proposed remedial Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill Groundwater extraction and ex-situ treatment of groundwater in open excavation pit If necessary, open pit application of a hydrogen donor in a Class II permeable backfill along with subsequent post-backfill injections.	Estimated excavation dimensions of 70° (W) x 43° (L) x 12° (D) Excavation of soil in unsaturated zone above proposed remedial goals Excavation of soil in saturated zone containing soil or groundwater above proposed remedial goals Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill Groundwater extraction and ex-stiu treatment of groundwater in open excavation pit If necessary, open pit application of a hydrogen donor in a Class II permeable backfill along with subsequent post-backfill injections.
	Estimate Excavati Excavati goals Off-site landfill Groundv	Estimate Excavati Excavati goals Off-site Groundy If necess with sub Backfill	Estimate Excavat Excavat Goals Off-site Off-ord If necess with sub	Estimat Excaval Excaval Excaval Excaval Goals Official Fineces with sul
Primary Risk Drivers	sure (Soil) Le (GW)	Indoor Air (Soil and GW) Direct Exposure (Soil)	Indoor Air (Soil and GW) Direct Exposure (Soil)	Indoor Air (Soil and GW) Direct Exposure (Soil)
Primary R	Direct Exposure (Soil) Ceiling Value (GW)	Indoor Air (Soil and G	Indoor Air (Soil and G Direct Exposure (Soil)	Indoor Air (Soil and G Direct Exposure (Soil)
	it least 4 to 6	sast 3 ft bgs; of a figure and a figure and a figure and a sabove the sast 8 ft bgs at 23-3 at 2 ft bgs at 25-3 at 2 ft bgs a fbgs a fbgs at 25-3 at 2 ft bgs a fbgs	9 ft bgs re proposed to 15 ft bgs f, B-22, and	APII-B1 at and API-B1 s and API-B1 s ast 6 to 15 ft ft bgs 2 ft bgs ft bgs
cern	Nickel above proposed remedial goal in soil in numerous locations at least 4 to 6 ft bgs, very limited data below 6 ft bgs. Nickel above proposed remedial goal in groundwater at CP-3 at least 6 ft bgs. Elevated concentrations of nickel in groundwater at numerous locations at least 6 to 15 ft bgs.	TCE above proposed remedial goal in soil at GP-11 at least 7.5 ft bgs (Winyl chloride above proposed remedial goal in soil at NGB-10 at least 3 ft bgs; numerous locations with detection limits above the proposed remedial goal in more the proposed remedial goal in groundwater at GP-11 at least 6 to 15 ft bgs PCE above proposed remedial goal in groundwater at W-2 at least 6 to 15 ft bgs PCE above proposed remedial goal in groundwater at W-2, W-3, and CK-4 at least 6 to 15 ft bgs, numerous locations with detection limits above the proposed remedial goal 1,1-DCA above proposed remedial goal in soil gas at SG-1, SG-2, and SG-3 at 2 ft bgs CS-1,2-DCE above proposed remedial goal in soil gas at SG-1, SG-2, and SG-3 at 2 ft bgs CS-1,2-DCE above proposed remedial goal in soil gas at SG-1, SG-2, and SG-3 at 2 ft bgs CS-1,2-DCE above proposed remedial goal in soil gas at SG-1, SG-2, and SG-3 at 2 ft bgs	TCE above proposed remedial goal in soil at B-22 and B-25 at least 9 ft bgs PCE, vinyl chloride, and 1,2-DCA in soil at detection limits above the proposed remedial goals at B-22 and B-25. TCE above proposed remedial goal in groundwater at B-14 at least 6 to 15 ft bgs Vinyl chloride above proposed remedial goal in groundwater at B-14, B-22, and B-25 at least 6 to 15 ft bgs	TCE above proposed remedial goal in soil at OS-2, CW-1, B-7, and API1-B1 at least 8.5 feet bgs FCE above proposed remedial goal in soil at OS-2, CW-1, B-2, B-3, and API-B1 at least 8.5 feet bgs 1,1-DCE above proposed remedial goal in soil at B-7 at least 4 ft bgs • PCE above proposed remedial goal in soil at B-7 at least 4 ft bgs • PCE above proposed remedial goal in soil at B-7 at least 6 to 15 ft bgs, numerous actections of TCE and numerous samples with detection limits above the proposed remedial goal in vinyl chloride TCE above proposed remedial goal in soil gas at SG-4 and SG-5 at 2 ft bgs PCE above proposed remedial goal in soil gas at SG-4 and SG-5 at 2 ft bgs Yinyl chloride above proposed remedial goal in soil gas at SG-4 at 2 ft bgs
f Potential Concern	al in soil in num bgs al in groundwate n groundwater at	in soil at GP-11 redial goal in soil fimits above the in groundwater in groundwater cedial goal in gro ous locations wit goal in groundw in soil gas at SC dial goal in soil i	l in soil at B-22 a in soil at detection I in groundwater redial goal in gro	TCE above proposed remedial goal in soil at OS-2, Clears 8.5 feet bgs PCE above proposed remedial goal in soil at OS-2, Clears 8.5 feet bgs 1,1-DCE above proposed remedial goal in soil at B-7-Bygs, unmerous detections of TCE and numerous san above the proposed remedial goal in soil at B-7-Bygs, numerous detections of TCE and numerous san above the proposed remedial goal in soi gas at SG-PCE above proposed remedial goal in soil gas at SG-PCE above proposed remedial goal in soil gas at SG-PCH above proposed remedial goal in soil gas at SG-PCH above proposed remedial goal in soil gas at SG-PCA above proposed remedial goal in soil 1,1-DCA above proposed remedial goal in soil 1,1-DCA above proposed remedial goal in soil gas at soil g
Chemicals of Potential	Nickel above proposed remedial goal in soil in thess, very limited data below 6 ft bgs Nickel above proposed remedial goal in ground Elevated concentrations of nickel in groundwar to 15 ft bgs	TCE above proposed remedial goal in soil at G Viny! chloride above proposed remedial goal in munerous locations with detection limits above TCE above proposed remedial goal in groundw Viny! chloride above proposed remedial goal in GCA at least 6 to 15 ft bg. mere considerable I,1-DCA above proposed remedial goal in TCE above proposed remedial goal in ground TCE above proposed remedial goal in gro TCE above proposed remedial goal in soil gas CS-1,2-DCE above proposed remedial goal in soil gas	TCE above proposed remedial goal in soil at B PCE, vinyl chloride, and 1,2-DCA in soil at de remedial goals at B-22 and B-25. TCE above proposed remedial goal in groundy Vinyl chloride above proposed remedial goal i B-25 at least 6 to 15 ft bgs	TCE above proposed remedial goal in soil at O least 8.5 feet bgs Are the state for the state of
	Nickel above prop ft bgs, very limitec Nickel above prop Elevated concentra to 15 ft bgs	TCE above proposed re Viny! chloride above prumerous locations with runnerous locations with CEE above proposed re PCE above proposed re PCE above proposed recent all assist to 15 ft proposed remedial goal i, 1-DCA above proposed recent and recent all assist to 15 ft proposed remedial goal control assistance in the proposed recent and rece	TCE above proposed remedial gr PCE, vinyl chloride, and 1.2-DC. Arendial goals at B-22 and B-25 TCE above proposed remedial goal Vinyl chloride above proposed re B-25 at least 6 to 15 ft bgs	TCE above proposes least 8.5 feet bgs PCE above propose at least 8.5 feet bgs i,1-DCE above project bgs, numerous detections bgs, numerous detections of PCE above propose Vinglichique abov Vinglichique abov Vinglichique abov Vinglichique abov Vinglichique abov Vinglichique above PCE above propose
	芝 毒 芝 苗 ♀ • • •		77 • PC •	• • • • • • • • • • • • • • • • • • •
fArea	ing Shop Area	chen Area		Former TCA Tank and Drum Storage Area
Name of Area	Former Ceramic Plating Shop Area	Former Chemical Kitchen Area	SWMU 11 Area	Former TCA Tank an Area

Table 5
Summary of Known Areas of Concern and Remedial Approach

Estimated excavation dimensions of 54 (W) x 60 (L) x 12 (D) Excavation of soil in unsaturated zone above proposed remedial goals Excavation of soil in saturated zone containing soil or groundwater above proposed remedial goals Goals Groundwater extraction and ex-situ treatment of groundwater in open excavation pit If necessary, open pit application of an oxidant in a Class II permeable backfill along with	 subsequent post-backfill injections. Backfill Estimated excavation dimensions of 17' (W) x 23' (L) x 6' (D) Excavation of soil in unsaturated zone above proposed remedial goals Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill Backfill 	Estimated excavation dimensions of 25′ (W) x 32′ (L) x 6′ (D) Excavation of soil in unsaturated zone above proposed remedial goals Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill Backfill	Estimated excavation dimensions of 37' (W) x 43' (L) x 6' (D) Excavation of soil in unsaturated zone above proposed remedial goals Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill Backfill	Estimated excavation dimensions of 50' (W) x 80' (L) x 4' (D) Excavation of soil in unsaturated zone above proposed remedial goals Off-site disposal of soil as necessary at a Class I (Cal Haz) or Class II landfill
Primary Risk Drivers Indoor Air (Soil and GW) Direct Exposure (Soil)	Direct Exposure (Soil)	Indoor Air (Soil) Direct Exposure (Soil)	Indoor Air (Soil) Direct Exposure (Soil)	Direct Exposure (Soil)
Benzene above proposed remedial goal in soil at B-1, B-17, and B-20 at least 11.5 of the bgs, ethylbenzene and xylenes also above proposed remedial goals in soil at B-1. Benzene above proposed remedial goal in groundwater at B-1 and B-17 at least 6 to 15 ft bgs, toluene, ethylbenzen, and xylenes also above proposed remedial goals in groundwater at B-1 and B-17. TPH-gasoline above proposed remedial goal in soil.	PCBs above proposed remedial goal in soil at B-5 at least 0.5 ft bgs TPH-diesel and TPH-motor oil above proposed goal in soil at B-5 at least 0.5 ft bgs	TCE above proposed remedial goal in soil at SWMU23-B4 at least 3.5 ft bgs Chromium above proposed remedial goal in soil at B-5 at least 4 ft bgs	 TCE above proposed remedial goal in soil at C-1 and C-3 at least 6 ft bgs PCE above proposed remedial goal in soil at SWMU23-B6, C-1, and C-3 at least 6 ft bgs 	Chromium above proposed remedial goal in soil at NGB-5 and NGB-6 at least 3.5 Nickel above proposed remedial goal in soil at NGB-5 and NGB-6 at least 3.5 ft bgs
Name of Area Former Gasoline UST Excavation Area	Electrical Transformer Area	Hazardous Waste Storage Area (Shed B)	Hazardous Waste Storage Area (Shed C)	Former Evaporation Ponds Area

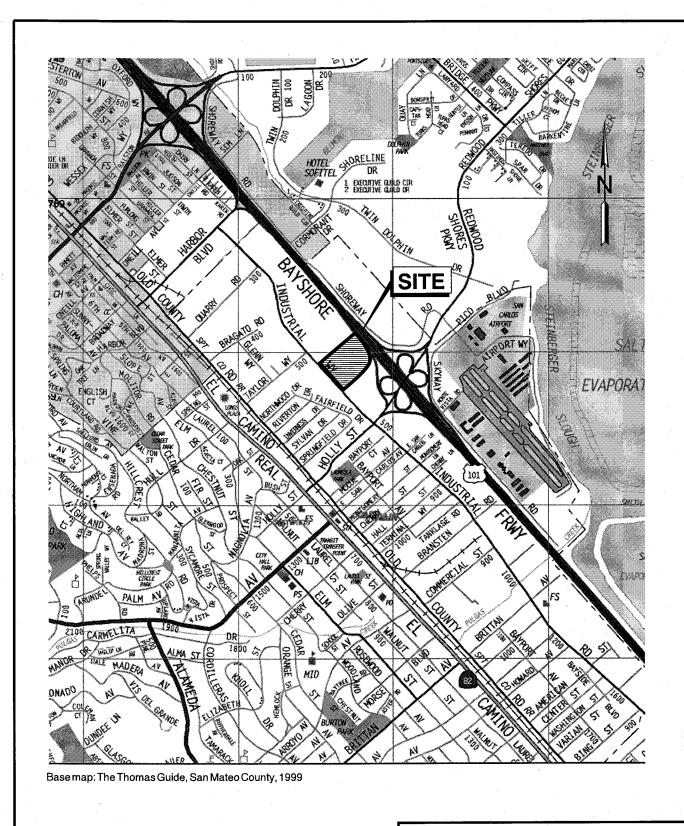
Remedial Action Plan 301 Industrial Way, San Carlos, CA

Table 6 Sampling Plan 301 Industrial Way, San Carlos, California

Pre-excavation Soil	Frequency	COMMINERIES
	step-out samples 10 to 25 feet beyond known affected areas	samples will be collected at approximately 3-, 6-, and 9-foot intervals
Excavation Floors Soil	1 sample every 900 to 2,500 sq feet	
Excavation Sidewalls Soil	1 sample every 25 to 50 linear feet	samples will be collected approximately every 3 feet vertically
Water in Excavations 1 pe	1 sample of water entering excavation per excavation area 1 sample/10,000 gal for treatment/ disposal purposes	sampling frequency may be adjusted based on seepage rate into excavation area. sampling frequency may be adjusted based on offsite disposal facility requirements.
Post Excavation VOC Soil Gas Sampling se	samples every 10 to 20 feet along excavation sidewalls	Field screening using PID or FID at approximately 2- and 5-foot depth intervals.
Stockpiled Soil	1 sample/750 to 1500 cubic yards	sampling frequency will be based on offsite disposal facility criteria, as required.

Notes:

- Chemical analyses may include VOCs, TPH (gas, diesel, and motor oil), metals, PCBs, and cyanide. Specific analyses will be selected based on the identified chemicals of concern for each excavation area. Sampling and analytical methods used for samples collected for laboratory analysis will have sufficient sensitivity to confirm whether or not remedial goals have been met. (a)
- (b) Sampling frequency will be based on the size and heterogeneity of excavation areas
- (c) Soil samples may be screened for VOCs in field using PID or FID



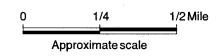
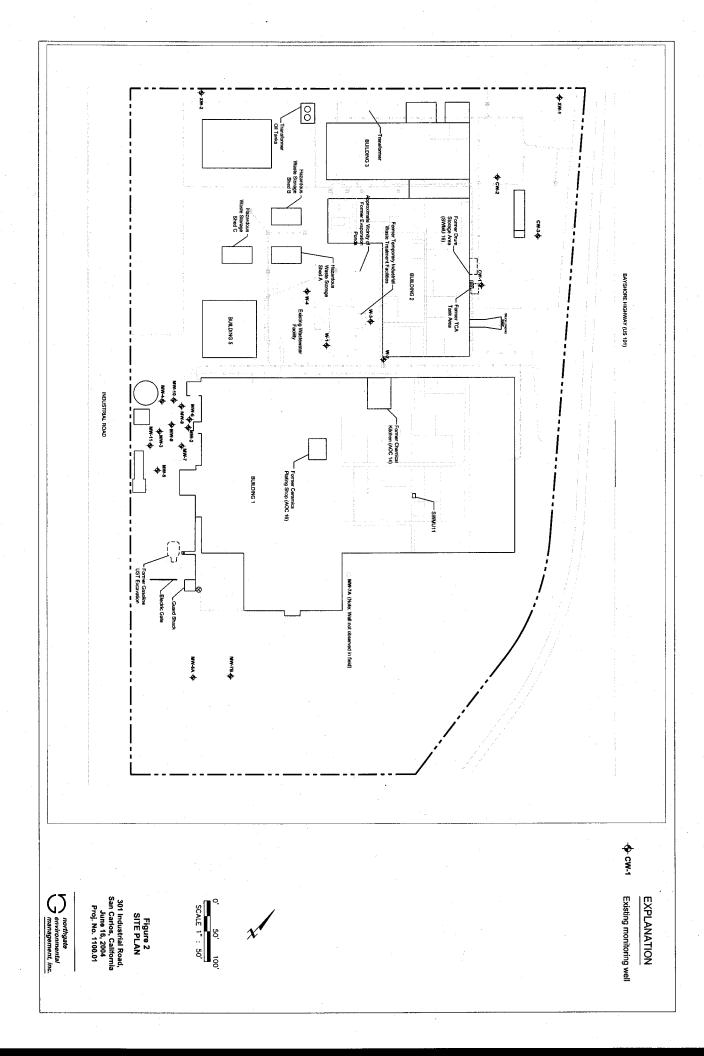
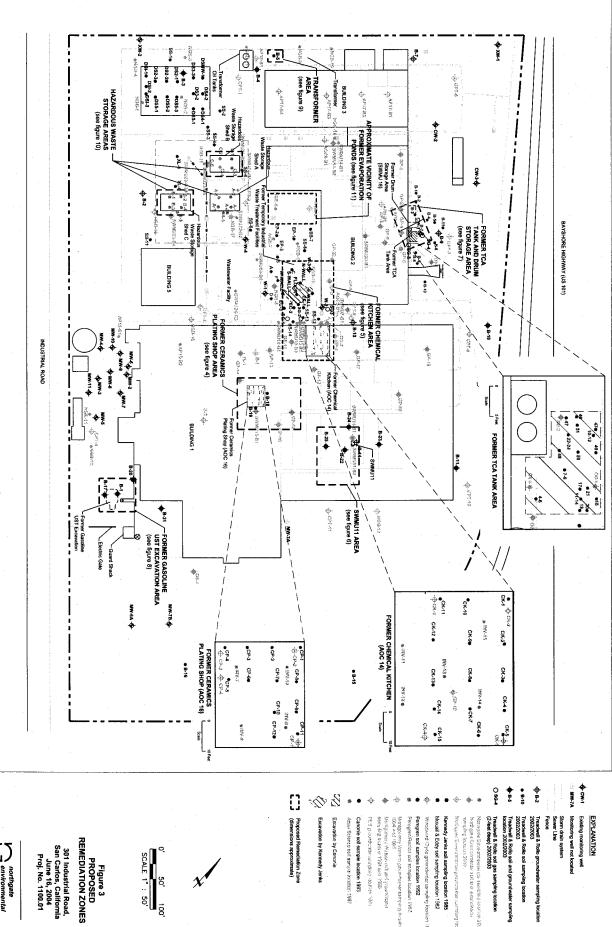


Figure 1 Site Location



301 Industrial Road San Carlos, California June 16, 2004 Proj. No. 1100.01





EXPLANATION

Existing monitoring well Monitoring well not located

Storm drain system Sewer Line

eadwell & Rollo soil sampling location 02/2003 ndwell & Rolio soil and groundwater sampling tion 2002/2003

Treadwell & Rollo soil gas sampling location (2-feet deep) 2002/2003

docingido Anolympolini ili sastindi il partat Zula Lydygino Kinacopedada: sci doki jedu sidazi yingiliy kuman 2653:

Kennedy Jenks soll sampling location 1985 Mexuali & Eddy soil sampling location 1982

Peregren soli samples location 1992

Skerigenary Walter ook wel geoorduste senging Kuleskii 1794 oori 1995 dender den syndemier syndemier danskiet general. Det met 1660

HES CONTROL PHISTORIUS SECURICO SE

Canonie soil sample location 1993 Science soil sangre krankin 1997

Excavation by Canonie

Excavation by Kennedy Jenks









301 Industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01

northgate environmental management, inc.

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6 68°48

proposed remedial goal is equivalent to Upper 95% Confidence Limit values for background soil concentrations, taken from Lawrence Berkeley National Laboratory Study, 1995

FORMER SUMP LOCATION (SWMU 15) SWMU15-0-1

CP-10 CP-128

CP-7

10 ANG 80

CP-3 CP-56 CP-1

CP4 CP-5

⊕ CP-2 CP-8 CP-9 CP-11 MCC-15e CP-9 CP-1 MCC-15e CP-14

● B-18

@ GP-16

Groundwater Sampling Results:

FORMER CERAMICS PLATING SHOP (AOC 16)

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EXPLANATION

- Treadwell & Rollo soil sampling location 2002/2003
- Woodward Olyde gnoundwater sampling location 1964 . ф-
- Peregrani Radian soli sempling location 1992
- Peregren soil sampling location 1992
- Aktrigonacy watern soil and gruin ovater semping location 1964 and 1965

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Northgata Environmental coil and gonerdeathr sempling hobilibis 2003

F-- Proposed Remediation Zone

ABBREVIATIONS

ND(x)P reported below detection limit
NR not risported
NR not lested analyzed
TRR (QS T Treadwelf & Roule in 2003
NW RF 15 se Analyzeneny Waston Ris in 1995
MW RF 15 se Analyzeneny Waston Ris in 1995
WW C 94 Woodward C),dde Investigation in 1994
W-C 94 Woodward C),dde Investigation in 1994

Ail ground water results reported in micrograms per liter (49f);
 Ail soil sample results reported in milligrams per kilogram (mg/kg).





Figure 4 FORMER CERAMICS PLATING SHOP AREA

301 Industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01

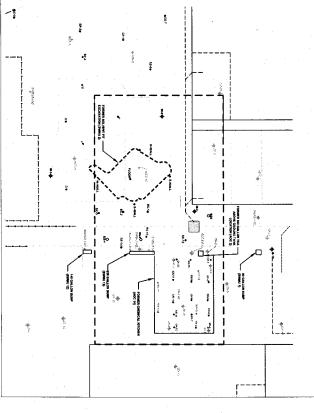


50-63	18-900Y	ACCS-B1	16-33OV	OD-2 @ 41'	OD-2 68 30'	NGB-10-2	NCE-8-9-5	N38-5-7.5, NGB-10-7.5	NGB 7-8, NGB 4-7-5	9.5-6-BDN 3.6-1-35W	NGB-7-1.6, NGB-8-2	GP-20-7.5	GP-20-4	99-20-2	GP-19-8	GF-19-3.5	GP:17-6.5	GP-17-4	GP-12-7	GP 12-4	GP-51-7.5	GP-11-3	GP-10-7.5	GP-99-35	GP-8-7	GP-0-3.5	GP-8-8	GP-8-25	GP:7.7.5	GP-7-2	Chemical Kitchen/Corridor	Sample (D.	Proposed Remedial Goal for VOCs in Soll	
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*	5	ž	Z,	š	NA NA	0041	NO (0.005)	ND (6.005)	ND (0.005)	ND (0.005)	ND (0.005)	ND (0.005)	ND (0.028)	NO (0.005)	ND (0.005)	NO (0.015)	ND (0.005)	ND (0.005)	ND (COUR)	ND (0.005)	4D (0.023)	NO COES	ND (0.005)	1(D) (G DCS)	NO (0.005)	ND (2006)	NO (C.OGS)	ND (0.005)	ND (0.005)	ND (0.005)		Fans.1,200E		1000

Groundwater Sampling Results:

Proposed Remedial Goal for VOCs in Groundwater	dial Goal for	VOC≡ in Grow	adwater	530	130	4 50000 350 1800 8300 200 8200	50000	350	1860	9008	200	9029	2600
Sample I.O.	Date	Depth	Roference	305	PCE	Vinyi Chlorida	11,1170	11,17CA 11,27CA 11-DCA	1.10CA	1.40CE	1.3.0CA	11-DCE 13-DCA CH-13-DCE	trans-1,3-DCE
Former Chemical Kitchen/Corridor Area	al Kitchen/Co	rridor Area											
GP-7	4/14/2003	6-12	#G3 G3	ND (5)	ND (5)	ND (10)	ND (5)	NO (5)	ND (5)	ND (5)	NO (6)	(9) ON	SI ON
GP-8	4142003	8118	NG3 03	(S) GN	HD (5)	(0) GM	NO (5)	ND (5)	is) ON	(S) GM	NO (8)	(g) GN	NO (8)
GP-9	4142003	\$1.9	NG9 03	(S) GF:	14D (5)	(DL) CIM	ND (5)	ND (5)	MD (3)	ND (S)	NO (d)	(8) 08	NO (8)
OF-40	\$500ZE!!P	6.15	HOSCS	_	ND (25)	(0S) (3N	ND (25)	NO (25)	ND (25)	28	NO (25)	920	ND (25)
GP-81	4/13/2003	6-16	NG3 G3		ND (20)	(Or) GN	40 CO	NO (20)	(OC) CBM	(C2) CM	ND (20)	150	(02) CM
GP-12	£000/£3/7	91¢	MC3 C3	9.4	ND (5)	(DE) CIN	(c) div	18) (3)	NO IS	(S) ON	NO (6)	(9) CIN	3E (6)
GP-13	4/12/2003	91-9	MG3 C3	(5) 0%	ND (5)	LOS) CIN	ND (5)	(S) CN	NO (Si	(B) QM	NC (6)	ND (S)	NO (5)
GP-19	6000/61/4	51.9	#G3 03	ND (5)	NO (5)	(01) CIN	ND (5)	ND (8)	NO (5)	ND (5)	NO (S)	ND (5)	NO (5)
OP-20	E00279149	\$1/3	##63 C3	9.7	38	HD (10)	NO (5)	NO (5)	ND (5)	ND (5)	NO (6)	(s) DM	NO (6)
NGB-8	D002016	61.9	NG2 03	26	(S) Q#	(DE) OM	ND (5)	NO (S	MD (S)	ND (5)	NO GO	(S) ON	(S) CW
GP-17	4/14/2003	\$ 75	NG5 G3	ND (5)	MD (5)	MD (10)	ND (5)	NO (5)	ND (5)	ND (5)	NO (5)	ND (5)	NO (5)
CPT-9	2/12/2003	55	NG 03	000	NO (8.0)	ND (30)	ND (5.0)	ND (5.0)		NO (5.0)	ND (5.0)	ND (5.9)	ND -5.03
\$4-2	SHEEFER	6-15	78.R 03	330	NO (50)	220	NO (50)	NO (50)		NO (60)	NO (50)	1200	ž
W-3	11/8/2002	6-15	78,97 03	2	130	NO (5)	NO (5)	NO (5)	(S)	XD (5)	NO (5)	NO (6)	£
813-GW	11/22/2002	8-15	T&R 03	ME (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND O.S	ND (0.5)	NO (0.5)	ND (0.5)	ND (0.5)	3
OD-2-shallow	\$1,601,005	24	SEW AFT SE	18	NO (0.5)	1.7	ND (0.5)	· MD (3.6)	9	À	ND (0.5)	34	ND (0.5)
CIC-2-deep	11/5/1985	38.5-40.0	WW AFT 95	ND (0.5) ND (0.5)	ND (0.5)	ND (9.8)	ND (0.8)	ND (0.5)	ND (0.5)	ND (0.5)	NO (0.5)	NC (0.9)	MG (0.5)
8.2	\$360,0355		SELEY MAN	÷2	ND (0.5)	37	ND (0.5)	NO (3.5)	ND (0.5)	1.	NO (0.5)	136	12
ey.3	1914/1985		98 ISV MW	20	35	6.91	ND (0.5)	ND (3.5)	ND (0.5)	ND (0.5)	NO (0.5)	23	1.3
CK-1	2/2/1994	85.3	M-034	ន	*5	GR	3	200	8	NO	NO.	Z,	*5
CK-4	Mesone	96.3	W-C 94	41	Æ	CIR	CON.	887	NO	NO	A)	¥	NH.
CK-2	2/2/1984	54.3	W-C 94	GR.	MR.	AD.	NO	NR	47	ND	o O	cu	ž
OK-2	2941994	5.16	W-C94	ð	35	ON	Š	S.	15	NO.	NC	SN	× 70
CKG	2/2/:894	38.7	#C94	ğ	¥R	NO.	22000	NR.	3700	3600	NO	×	ž
CK-3	2/4/1994	7.56	WC94	ON	145	NO.	28000	ž	4000	3100	š	ND.	ž
CK-S	2/4/1994		W-C 94	ð	NA.	NO	26000	NR.	3900	3200	š	š	35
CX-4	2/3/1994	5.68	M-C 94	*	ž	19	3	NR	11	No	S	120	ž
	MOD NO.	82.4	M-094	986	₹	28	GN.	N.	33	š	ě	30	ž

_	_				_		,
56-3	256	\$6.	Former Ch	Sample	Proposed		Soil G
12/:9/202	12/19/200	12/19/200	emical Kitchen	O. Date	Remedial Goal		Soil Gas Sam
~	2 2	2	Carddor	Caspith	for VOCs in S		pling Results:
15.R 03	78R 03	16R 03		Asterence	oll Gars		esults:
17720	2255	2739		100	1200	īœ	
- 6	41	×		906	410	PCF	
ź	NC	NO		Vinyl Chloride	31	Yaryi Chibrida	
- i	125	#XXX		1.1.7.753	48000	1,11-TCA	
×	259	3093		1,1-0CA	: 8	1.1-0EA	
5:56	ĸ	83		11006	42000	1,1-DCE	
9516	478	35		SM-1.2-DCE	7300	cm-1,2-DCE	
*	ð			Harm-1, 2-000	15000	trans-1,2400E	



Existing monitoring well Monitoring well not located

Storm drain system Sewer Line

Treadwell & Rollo groundwater sampling location 2002/2003 eadwell & Rollo soil sampling location 102/2003

Freadwell & Rolko soil gas sampling location (2-feet deep) 2002/2003 eadwelf & Rollo soil and groundwater sampling cation 2002/2003

Bygy's Kuskrumental and sempling control 1865 myling tindex cosesum soil and generalisativ mang boethon 7007

Kennedy Jenks soll sampling location 1985 Matcalf & Eddy soil sampling location 1982

Stondand Chyde gerundwate sampliny feratam 1898 Pengren soll samples kradon 1982 Pengrenfitedun val samples locaton 1982

lyomany issiencie grounder filer exempling byzauch Lyond Nivak

avation by Kennedy Jenks

Notes: 1. All ground water results reported in micrograms per liter (µgft): 2. All poil sample results reported in militigrams per kilogram (mg/kg).



0' 20' 40' SCALE 1" : 20'

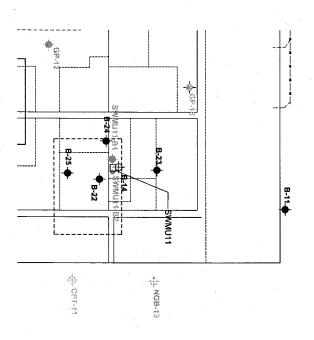
Figure 5 / FORMER CHEMICAL KITCHEN AREA 301 Industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01

northgate environmental management, inc.

B25-8.5	B25-7.5	824-9.0	B24-7.5	523.85	B23-7.5	822-3.0	822-7-5	B22-8.0	B11.20	CP-18-7.5	GP-18-4	3WMU 11	Carry Line	roposed	
4/12/2003	4/12/2003	4/12/2003	4/12/2003	4/12/2003	4/12/2003	4/12/2003	4/12/2003	4/12/2003	11/21/2002	\$ 4/12/2003	4/12/2003		Date:	Remedial G	
8.5	7.5	9	7.5	8.5	7.5	9	7.5	8	2	7.5	Þ		Depath	al Goal for VOCs in So	
13R 03	T&R 63	1'8R'03	18R 03	18E 03	18R 03	18R 03	18R 03	73R 03	13R03	NG3 03	WC3 03		Perfer ence	in Soll	
8.36	ND (0.025)	NO (0.006)	(SD(C)) (31	(C.005)	(S00°3) ON	9.57	2.4	0.21	NO (0.005)	(500 0) CM (500 0) CM	NE (0.005)		TEF	8.26	TCE
MC (0.025)	ND (0.025)	ND (0.005)	NC (9.005)	MC (0 005)	(500 C) ON	ND (0.025)	€25	NO (0.025)	S0000	NEO (0.005)	NC (0.005)		3	834.0	PCE
<8.826	<0.925	ND (0.006)	ND (0.005)	(S00 00 Car	(S03'0) (34	<0.025	A.24	<0.425	150000S)	#D (#.#1)	HD (8.41)		Yayi Chioride	8,9967	Yanyi Chloride
ž	3	3	35	35	75	ž	3	ħ	3	NO (0.005)	ND (0.005)		1.1.1 TCA	7.8	1.11.16.4
3	3	3	ž	3	3	35	ž	3	3	ND (0.905)	HD (0.005)		1,1,2 TCA	0.033	142164
Z	3	N.	35	3	₹	3	Z,	3	36	NO (0.005)	NE (0.005)		11004	9.33	1.100.4
3,	3	35	3	3	3	3 ,	3	秀	5	ND (0.005) IND (0.005	ND (0.005)		1,1-807	5	1,9-DEE
357	180 (8.825)	NO (0.005)	ND (0.005)	NO (0.005)	NE (0.005)	HE (0,025)	MD (8.26)	ND (8.025)	NC (0.005)	ND (0.005)	ND (0:005) ND (0:005)		1,2 DCA	8.925	1,3.00.4
0.52	0.18	8D (0.00S)	ND (JUNS)	ND (0.005)	ND (0.065)	0.37	20 (0.25)	MD (0.025)	ND (0.005)	ND (0.005)	ND (0.005)		cia 12 DCF	1.6	chs 1,2-BCE
£	3	*	ž	3	3	3	7	5	5	ND (0.005)	NO (0.005)		trans 1,2-DC	3.4	trans 1,2 DC

Groundwater Sampling Results:

	4/13/2003 4/13/2003	4/13/2003		_	B14-GW 12/18/2002 B-15	B11-34V 11/22/2002 6-15	CPT-11 2/12/2003 51	HOB-13 3/11/2003 6-15	GP-18 4/12/2003 6-12	SWNHJ 11	Sample t.D. Date Dep	Proposed Remedial Goal for VOC		
5 18R03		+	-		5 T&R 03		MO1 03	% NG2 93	2 NG3 03		the lighterance	r VOCs in Granndwater		
10 ND 00 5	NO 30			350	1989 100	NC (0.5) NO (0.5)	SON CON	NO (5) NO (5)	55 200		TCE PA	638 131	ice e	
Ŧ			NO (0.5) NO (0.5)	(16)	AD (25) 678			(5) 100 (18)	(5) 180 (14)		CE - Varage Clatorates	*	CE VENY CHIOTHE	
1000	5	ND(t)	7 5 (3)	ND (10)	ND (26)	NO (0.5)	10 (3.3)	N D (S)	NO (5)		1,1,1 ICA	58660	1,1,100	
	5	3 G)	ð	NO (10)	NO (25)	X0 (0.5)	ND (5.0)	ND (5)	40 (S)		1,1270	364	1.7.2 FCA	
	3	(E) (SE	3	NO (10)	ND (25)	NO (0.5)	NC (5.0)	(S)	8 0(5)		1.1.DCA	1990	1,1 BCA	
	3.S#	(S.D) Clark	NO (0.5)	(S)	25	NO (0.5)	NO (5.6)	(S)	16 (9)		1,1902	6380	1001	
	0.5	ND (0.5)	8.5	76 (10)	10 (25)	0.5	(S 0)	NO (5)	35 (§)		7200	298	12 OCA	
	88	36 (1)	3	750	2500	ND (0.5)	(3.5) @4) (€)	ND(8)		C1#-1.2-DCT	6200	cis-1,2-0CE	
	ě	ND (0.5)	3	5		7	MP (5.0)	#D(S)	35 (5)		trans-1,2-002	2840	tranp 4,2 BCL	



EXPLANATION

- Treadwell & Rollo groundwater sampling location 2002/2003
- Treadwell & Rollo soil sampling location 2002/2003
- Treadwell & Rollo soil and groundwater sampling location 2002/2003
- Northpale Environmental and and proundwater sampling location 2005
- de 1984 and 1986 -b) Northyase Environmental groundwater semaling location 2000 1864 and 1585
- C T Proposed Remediation Zone (dimensions approximate)

ABBREVIATIONS

ND(x)= reported below detection limit
N= not reported
N = not retoried
N = red tested analyzed
N = red tested tested tested analyzed
N = red tested teste

Notes:

1. All ground water results reported in micrograms per liter (µg/l);

Z. All soil sample results reported in milligrams per kidogram (mg/kg);

S. SVMMU11-81 was only tested for metals; all metals were reported below detection limits.



Figure 6 SWMU 11 AREA

301 Industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01

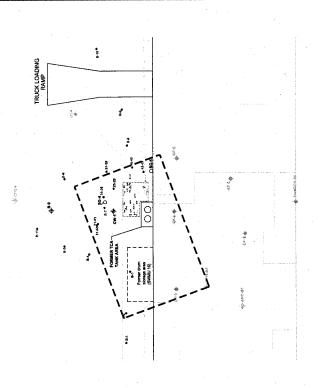


Groundwater Sampling Results:

				108	904	Varyi Chlorida	1.1.F.TCA	1.12-TCA	4.0CA	4 CCE	1.2.DCA	11-0CE 12-DCA c1s-12-DCE	trans-1.2-DCE
Proposed Remedial Goal for VOCs in Groundwater	Boal for VOCs in	Broundwate		83	130	•	8000\$	350	1000	0959	200	6280	0097
Sample LD.	Dake	#dat	Reference	301	204	Wanyi Cirilor lale	1,1,1-TCA	1,1,2-TGA	4.4-DCA		1,4DCE 1,2DCA	ele-1,3-DCE	HOUSE, SHEE
Former TCA Tank and	TCA Tank and Drum Storage Area	Area											
GP-1	4/11/2003	6.15	NG3 03	- 21	9.8	ND (10)	2.8	(S) QN	7.4	(g) QN	ND (5)	ND (5)	ND (5)
GP-2	4/13/2003	6-15	NG3 03	360	0/1	ND (10)	130	(S) ON	32	59	ND (5)	6.2	(S) QN
GP-3	4/13/2003	6-15	NG3 03	Œ	(g) QN	MD (10)	180	(S) QN	5.8	46	ND (5)	ND (5) .	ND (5)
GP-4	4/14/2003	6-15	NG3 03	(g) (JN	(S) QN	MD (10)	(S) QN	(S) QN	(S) QN	(S) QN	ND (5)	NO (5)	ND (5)
GP-6	4/14/2003	6.15	NG3 03	(g) QN	(g) QN	MD (10)	(S) ON	(S) QN	(S) QN	(S) QN	ND (5)	ND (5)	ND (5)
945	4/14/2003	8-15	NG3 03	(s) an	(s) QN	MD (10)	ND (5)	(S) QN	ND (5)	(S) GN	ND (5)	ND (5)	(S) QN
297-7	2/11/2003	42	NG 03	() QN	(0'S) QN	(01) QN	(0'S) QN	(0'S) QN	(0'S) QN	(0.5) QN	NO (5.0)	ND (5.0)	ND (5.0)
CW-1	11/8/2002	6.15	T&R 03	470	(05) QN	(05) QN	(as) GN	(05) CN	ND (50)	(0S) CIN	ND (50)	ND (50)	N.
CW-2	11/8/2002	91-9	7.8.R 03	(5) GN	(s) QN	(S) CN	(S) QN	ND (S)	(S) QN	(g) QN	ND (5)	ND (5)	88
CW-3	11/8/2002	5-15	T&R 03	(DS) QN	(05) QN	(05) QM	(05) QN	(0S) QN	(0S) CIN	(05) QN	(05) CN	ND (50)	NR.
39-GW	11/22/2002	8-15	T&R 03	250	ę	(S:0) QN	15	1.2	69	29	2.2	. 44	an
-W-1	11/16/1992		Canonie 93	150	12	ND (2.5)	15	ND (1.3)	52	18	3	15	ND (1.3)
DD-1-shallow	11/6/1995	24	MW AFI 96	9.6	(SO) QN	(S:0) QN	9'1	(5:0) ON	18.0	2.5	(5:0) QN	(9'0) QN	(9.6) ON
DUP#1	11/6/1985	74	MW AFT 96	=	(S.9) CIN	ND (0.5)	1.9	(5:0) QN	16.0	6.2	ND (0.5)	ND (0.5)	(5:0) GN
OD-1-deep	11/8/1895	37.38	MW AFT 96	ND (0.5)	(5:0) CIN	(9:0) GN	(S:0) GN	(S:0) QN	(9.5) ND (0.5)	(9'0) ON	(S:0) QN	ND (0.5)	(9.0) QN
DUP-2	11/8/1995	37-38	MW AFI 96	(S:0) CN	(50) QN	ND (0.5)	ND (0.5)	(S:0) QN	(5:0) QN	(5'0) QN	(9.0) QN	ND (0.5)	ND (0.5)
SWMU20-B1	1995	8.5-18.5	MW RFI 85	82	×2	NR	6.0	æ	*	ž	ž	100	ď
AP11-81	1995	91-8	MW RF195	3	-6.0	NR	4	NR.	-	6	ž	-	ž
		***	30 130 1991	***	***	9					. 017		97

Soil Gas Sampling Results:

w			-	_		_
irans-1,2-DCE	15000	trans-1,2-DCE		253	QN	QΝ
ets-1,2-DCE	7300	chs-1,2-DCE		3962	115	111
1,1-DCE	42000	1,1-DCE		63438	Z 28	7.28
1,000	1500	1,1.DCA		18214	096	362
1.1.1.TCA	46000	1,1,1.TCA		12550	£3 4	453
Varyt Chloride	31	Vinyl Chloride		148	QN	ON
2	410	æ		8817	878	829
32	1200	TCE		182572	7518	7518
	32	Reference		T&R 03	T&R 03	T&R 03
	Cs in Soll G	Depth		2	2	2
	ial Goal for VOCs in Soll Gas	Date	k Area	12/19/2002	12/19/2002	12/19/2002
	Proosed Remedia	Sample I.D.	Former TCA Tank Area	SG-4	SG-5	SG-5 Duplicate



Soil Sampling Results:

D		605	Ses.	8	(cas)	9	Capt	Con	600	(900	(500	G		G S	999	(906)	990	(800	38	South	900	6	ŝ	I		L	Ţ	Ţ,],	¥			~		É	3	í i	3	9	0.1)	(500	1900	ý	ú	3	3 6	9	68	9		ŝ	6	3	9	9	Ī	9	1 8	ú	í	(cm	(600)	(S00)	Sec	1	6	(90	(900		98	900	888	888	0.005)	0.005)	0.005 0.005	698	0.005 0.005	88 2 2 2 2	888	0.000 000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.
1 T		Н	-	4	4	STEP CENTER	4	2 00	9	8		1	1	200	4	-	ND (CDO	L	SO CO CAN	1	NO CO COM	Ļ	1	1.					2	Z	Z	2	2	2	4.	4	4	-4	(S00.00)	_	_	_	SOL ON	_		2 6	4	+	+	2000	+	+	+	(COO) (N	+	+	20000	+	2000	-1	4	_	_	┺	4	-	_	_	ŀ	-	-		22	+			-+				-4-1-4-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-
tis 1,240.2 (trans.1,24) 1,6 3,1 dis 1,2 00.7 (trans.1,24)			NC (0.005)	0000	2000	(0000)	(0000) (32	P. (0.000)	NC (0.005)	NC (0.005)	NO 00 005	9000	20000	N (CURS)	5	NC (0.005)	9800	NO COOR	CSUD UP CSN	200	SOU CO	NC OF CAR	NE COOK	Ģ	ç	ş	ş	9	2	2	9	9	QV	۶	200	2000	0.00	100 G	NO (0.005)	MD (0:1)	(500:0) ON	SOUT OF GIV	9600	500	1	1000	(000)	00000	7000	0.005	(cump) ON	SD (0)	۷.	0.000	2	2	00000		200	3 8	1000	ND (5,005)	800.00 CM	(S00.0)				900 (0) CIN	ND:00:005		ND (0.005)	200 E O O	(300.005) ND (0.005) ND (0.005)	800 00 0N 800 00 0N 800 00 0N	00.00 GM 00.00 GM 00.00 GM 00.00 GM	00.000 00.000 00.000 00.000 00.000 00.000 00.000 00.000 00.000	00.00 ON	00000000000000000000000000000000000000	NO (0.006 NO (0.006 NO (0.006 NO (0.006 NO (0.006 NO (0.006	ND (0.006 ND (0.006 ND (0.006 NR NR NR NR NR NR NR NR	NO (0.005)
128CA 178CA				NO. 10 CO.	NO UNITED	NO GREEN	NO (0.18.6)	(S) (S) (S)	(S00.0) ON	ND (0.005)	(300 0) ON	30000		30 (0 DE	No other	ĝ	ND:0.0061	(BOO) (BV	(3000)	Owo Or Care	(900 0: UN	COO C: US	AD 0.005	98	9	9	9	9	į !	ž	ž	ž	æ	2	200		0000	NO (B) (S)	(S)(0)(N)	10 (6.1)	(S00'0) CN	COU OU CA	COU UV CN	900	200	0000	Con D	(2000)	(SOUTO) ON	(S00.0) ON	NO (0.005)	NO (0.005)	SCO.US	SO 00 00	(SU.D.)	ž	107070		9		(cm)	NO (0,005)	(S000) ON	NO RECEST	900				(S00.0) QN	900 00 00		ž	E E	2 2 2	£ % % %	2 2 2 2	£ % % % £ £	£ & & & & & & & & & & & & & & & & & & &	£ # # # # # # # # #	£ 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	& & & & & & & & & & & & & & & & & & &
12 P.		2		RC (0.005)	5	(S000)	NO (OME)	PRO (U.O.D.)	NC (0.005)	NC (0.005)	NO 0051	SCO CLIN		NO (0.325)				100000	200	AP. CO. CO.CO.	COUNTY OF	AT COM		9	G	S		2	2	€	2	2	2	2	200	0000	(complex	ND (0.005)	(S00,0) ON	100 (0.1)	(500 t) (N	SWUGN	CSOU GO CN	900 00 00		(SOCIO) ON	(cmm) and	(con 0)	(comp) ou	(SOUTH CAN	(GUUS)	NO (0.005)	1	(SOOD) ON	STEEL STEEL	2	300	200	(200 CM		n man	ND (0.005)	(S00.0) ON	NO (0.005)	900	50000	(NE) (0.005)	(S00'0) CN	NO RO BOOK	COO CO CN		003	50 0 80 0	0.03 0.086 0.000	0.03 0.088 ND (0.008)	0.03 NO (0.006) NO (0.007)	0.03 0.086 ND (0.008) ND (0.010) ND (0.010) ND (0.010)	0.03 NO (0.009) NO (0.010) 0.046 NO (0.009) NO (0.009)	0.03 0.086 ND (0.009) ND (0.010) ND (0.009) ND (0.009) NR	0.03 NO.0009 NO.0009 NO.0009 NR	00000000000000000000000000000000000000
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4.2 T.S. 2.2			NO (0.005)	NO 00 0063	NO ODC	NO (0 00E)	(S) (N)	New (III UNITED)		(500.0) ON	COORDS CON	CAND SO CAN	Cally at Call	NO (0.00%) NO (0.00%)	NO (8 0 Kg)	(900 a) CN	NO (0.006)	00 0 00 00 00 00 00 00 00 00 00 00 00 0	COU CO CIN	0000 000	CAUD CO CA	COURT	100 00 000		¥	9		1	E!	¥	ž	¥	N.	9	000 07 04	2 2	(Comp)	(COC)	00.00 00	NO (8.1)	(500 0) CN	GOO OF CA	500 00 00	9	COMP CO		(CONTO) CA	(CO) (O)	MO (SURE)	(GIII II) ON	900	(C000) ON	NO (Gross)	-	000	5		100	0000		SW (0.005)	ND (0.005)	(S00:0) CN	SECOLON			0000	(S00:0) (N	(S00'0) CN	(S00'0) CN		ź	¥ 9	2 2 2	¥ ¥ ¥	¥ ¥ ¥ 9	2 2 2 2 2 2	= = = = = = = = = = = = = = = = = = =	= = = = = = = = = = = = = = = = = = =	= = = = = = = = = = = = = = = = = = =	=
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Pary Checke 11,117.Cd 11,27.dd 11,50.C 11,30.C cas 12,50.C Innex 12,50.C 1,30.C 12,50.C cas 12,50.C List 1,30.C 12,50.C List 1,30.C List 1,30.C		(14/6) (B)	MD (8.84)	(a,e)	100 (B.BT)	(6.01)	(8.04)	100 (B.PH.)	MD (R.01)	140 (B.PT)	HE (0.84%)	Own op Call	1000	(B.87)	(B.P55)	HD (4.1715)	1	ı	1		MO (0) (0)	Ē	ACC COLOR	92	9	gy.	9		Ę	ž	ž	ž	¥	2	100 00 000	(o'a) CM	(Le.0)	MO (9.91)	MD (0.01)	MD (4.2)	ND (0.01)	MD 40 041	ED /46 641	100 (40.00)	100 100 100	(Lavas Car	MO (0.01)	100	(0.01)	MD (0.04)	(a.01)	ED (8:04)	ED (E-C1)	100 (B.041)	10 (4.67)	ž	HD (0.05)		10.00	-1	- 1			MD (0.01)	-		ž	Þ		Þ	97	٤	2	£ £ £	Ш						F
PCE PCE		NC (0.005)	NC (0 005)	NC (0.005)	000	NC (0.305)	(0.80g)	(G) (N)	(0000)	(S00'0) ON	MC (0.005)	Company of	10000	PEC (U.O.D.)	0.014	NC (0.006)		ND (000)	+-		00000	CO0000	3000	9	Ģ	***			2	9	9	9	9	5					ND (0.005)	673	(S00'0) ON	GOOD		9	100 00 Ca	remman.	(cmn)		NO (0.005)	(COMP)	(S0005)	(S00.05)	(SOD:D) ON	(S00.00S)	(S000) ON	2	(connico	(000)	(C. (U.U.)	00000	(CONTO) CN	NO (0.005)	1900 DJ QN	NOM		(600 D) Q	(S00.0) ON	(900'9) ON	(900 0) ON	(S00'0) ON (S00'0) ON		100	**	9.0	0.00 0.007	0.007 0.007 0.007 0.007 0.007	0.007 ND (0.010) 0.042	0.46 0.007 ND (0.010) 0.042 ND (0.006) ND (0.006)	0.037 0.046 0.017 0.007 0.027 0.007 0.022 0.042 0.022 0.042 0.009 ND (0.009)	0.46 0.007 ND (0.010) ND (0.006) NR NR	0.46 0.007 NO (0.010) NO (0.009) NO (0.009) NR
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affor VOCs Depth	Brown Stock	,	7	*	1	3.5	2	•	22	m	6.5	,	•	37	•	*	ş	÷	,		,	ş	8	06.30	30.00	2707	0000	200	no.	20.25	4.0-4.5	0.5-1.0	20-2.5	5707	2 0 0	2003	3 1.50	20-25	35-4.0	0.5-1.0	15.20	35.45	0610	1	2000	2	0.1-6.0	13.50	35-4.0	01-00	15.20	4045	0.5-1.0	20-25	3540	0.50	20.23	0 100	0000	75.50	4.04.5	0.5-1.0	25.30	4045	2000	0.5-1.0	2530	3.5.4.0	20.25	4045		,	, 5	5.9	8 8 5	8 5 5	8 55 25 88	8 8 8 8 8 8 8 8 8	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	85 85 85 85 85 86 85 85 85 85 85
benvedial Go Date	Touch and I	4711/2003	4/11/2003	4413/2003	4413/2003	443700	40.30303	100	4417,003	47.473033	47.42003	20003	47.47.48.03	47:472003	11,01985	11,631885	11.03/886	٤	44.78.00000		90000	900	41.64006	000	CON.	9			286	2	1992	1962	1982	680	700	788 01711	11 /1 0/2 982	11/10/992	11/10/992	11,11.07 992	11,5,0,7,982	11 11 04 000		200	288 0171	786 7011	786 MULL	768.0011	11/10/992	11 A DV 982	11/10/1992	11/10/1992	11 /1 GV 992	11/10/1992	11/10/1992	266 MULL	11 mm 992	14 (10 000	1100 992	788 40 44 4	11/10V 99Z	11/10/1992	11/10/982	11.00-002	286 (01/11	11/10/1992	111101992	11/10/1992	11/10/982	11/10/992	4005		1985	286	88 58 5	88 28 29 20	286 286 286	286 286 286 286 286 286 286 286	282 282 283 283 283 283 283 283 283 283	262 262 262 263 263 263 263 263 263 263	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8
Proposed 8 Sample LD	Section TC	41.40	66-1.7	37	2.78	OF-3.35	G-3.7.5	4	GF-4-7.5	68.30	CP-5-8.5	200	1	G-5.75	8	****SO	08.200	08.2 @ 11	10 to 000		0 00	. C.	0.00	1000	Care	1			7	Č.	CW2	CM3	CW3	CAVS	2	1	á	ã	P-1	B-2	9.5	2.0	1	3	2	3	1	1	7	9	9	8-8	8	8	2	ì	أذ	ì		3	2	66	8.8	9.0		9-10	9-10	9-10	11.0	9-11		API B	API 9	APH 91	APR 91	APRIGH SP	APR 99 99 99 99 99 99 99 99 99 99 99 99 99	APR-81 APR-82 APR-82 APR-82 APR-82	API-81 API-81 API-82 API-82 API-82 API-82	APH-B1 APH-B1 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2 APH-B2	APH-BY AP

EXPLANATION

Existing monitoring well ⊕ cw-1

Treadwell & Rollo soil gas sampling location (2-feet deep) 2002/2003

Treadwell & Rollo groundwater sampling location 2002/2003

⇔ B-2

kresine Crakenarik preparam sanimiy totakan 200 Prasin 1985 Nothgale Endoscovada soll sod groodwole sorgeng humbu 2005

Mangemay Wales col and granded sangleging house 1984 and 1985 Cancnie soil semple location 1993

Excevation by Canonia

Proposed Remediation Zone (dimensions approximate)

ABBREVIATIONS

ND(s)= reported below detection limit
NT= not response for response for knot in 2003
TRR 01 or Treasmel for fixe the 2003
NR 210 SE TEXT MORTING THE NEWSELDS FOR IN 1995
WAS 105 = TEXT MORTING THE NEWSELDS FOR IN 1995
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FIGURE 7 FORMER TCA TANK AND DRUM STORAGE AREA

301 industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01

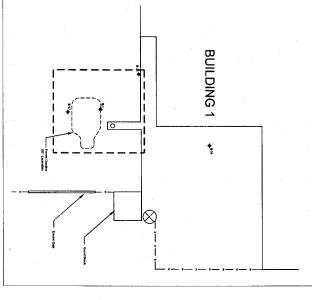


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3	9.5 2.6-3.5	821-7.5	821-11	B20-7.5	B17-44	B17-7.0	B17-5.0	B17-3.5	Bt.43.5	B1-11.5	B1-7.5	81-5.5	B1-2.0	UST	arapite LD	pased	
CARCENCE > 11.10H	12/18/2002	12/18/2002	12/18/2002	12/16/2002	12/18/2002	12/18/2002	12/15/2002	12/18/2002	Bt-43.5 11/22/2002	11/22/2002	11/22/2002	11/22/2002	11/22/2002		ample LD. Date Depth Reference	repased Remedial Goal for VOCs in Soil	
11.5	9.5	7.5	2	7.5	11	7	(h	3.5	13.5	11.5	7.5	5.5	2		Depth	al for YOC	
13803	18R 03	18R 03	14R 03	T8R 03	18R 03	T&R 03	18R 03	T8# 03	18R 03	18# 03	72R 03	18,803	T&R 03		Reference	s in Soil	
114	N.	N	3	M	H	N	3	4	3	ND (2.5)	ND (0.5)	ND (0.5)			ā	8.26	ā
5	N	×	Ŋ	NT	Ŋ	NI	N	4	5	MD (2.5)	MD (0.5)	ND (0.5)	N.		PCE	6,688	ā
15c (1) (M)	MD (0.25)	HD (8-25)	180 (0.25)	0.51	0.3%	5.1	HD (0.25)	HD (0.25)	MO (0.005)	23	3.9	ND (1.25)	(SOC 0) ON		Benzene	9.18	Berszeise
S (C)	ND (0.25)	HD (8.25) NO (0.25)	ND (0.25)	0.044	0.24	14	NO (0.25)	NO (325)	0.0224	R	10	2.9	(500'0) ON (500'0) ON		Totalene	2.3	Totoerse
SCOOM SCOOM SCOOM	ND (0.25)	NO (0.25)	ND (0.25)	ND (0.25)	0.34	2.7	ND (0.25)	15 (0.25)	0.006	÷	44	12	(SD(70) (IN		Ethytherizene	4.7	Ellysbenzene
2000	W0 (8.5)	NO (0.5)	₩ (9.5)	0.057	0.66	13	760 (0.5)	NO (0.5)	0.028	*	28	25	ND (0:005)		Toluene Ethylbenzene Total Xylones	15	Totalene Ethystenzene Total Sylenes MTSE
N.	N	×	3	N	3	27	3	z	NO (0.005)	IID (2.5)	10 000	NO (3.25)	ND (0.005)		馬馬	~	#18F
Z,	M	4	N	3	×	N	*	3	4	ND (2.5)	180 (0.5)	#B (0.5)	Ŋ		Trey! Charge 1,1,1-TCA 1,1,2-TCA 1,1-DCA 1,1-DCE 1,2-DCA cha-1,2-DCE trans-1,2-DCE	9,246.7	Vinyl Chiaride \$11.1-TCA \$152-TCA \$1-DCA \$1-DCE \$2-DCA \$84-52-DCE
z	M	Z	3	Z	¥	M	3	Z,	š	*	36	36	Ą		1,1.1-TCA	7.8	1,1,1-TCA
¥,	21	3	3	ž	**	3	×	3	3	3	ž	Ħ	3		1,1,2.104	0.833	1,12-TCA
z,	4	4	3	3	4	3	3	4	3	3	25	S	4		1.1-BCA	5	1,1-DCA
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7	Z	4	3	Z	4	Z	4	3	4	ND (2.5)	ND (0.5)	ND (0.5)	Z,		2.0CA	8.025	2.00.4
3	3	3	NI	3	NT	4	3	3	z	ND (2.5)	NO (0.5)	NO (0.5)	3		th-1,2-0CE	1,6	1.1.2-0CE
3	3	Ŋ	3	2	Z,	4	3	3	3	ž	秀	3	3		ti and 12-DCE	14	trans-1,2-0CE

				Ausclar 1754	Apoclor 1254 Apoclor 1260	PCE:	33441	CHAI	CHERRAL
Proposed F	posed Remedial Goal for Others in Sof	for Othe	e in Sofi	9.22	0.22	9.22	1	500	445
Sanuale (.D.	Date:	Dopth	Parletores	Perference Arealor 1261	Aracia 1290	PCH*	D-Bell	OHet	OM*Hel
UST									
81.2.0	11/22/2002	2	18R (3)	žĮ.	Z,	134	NO (2.5)	N	ah.
81.55	11/22/2002	5.5	158 03	ΝŢ	MT	3	#688	170	ND (3S)
Br.7.5	11/22/2002	7.5	188 03	M	TM.	N,	ú	7.2	ND (13)
B1-11.5	11/22/2002	11.5	18/8/03	Z,	Z,	異	3	à	(£1) OK
81.13.5	11/22/2002	13.5	15R (3)	3	3	3	6035	3	3
B17.35	12/16/2002	3.5	13R D3	4	X,	4	1003	5	4
817-5.0	12/18/2002	y,	13R 93	Z	Z,	Ŋ	3B(25)	z	ĸ
817-7.0	12/18/2002	7	18R93	4	×	4	ž	N	3
B17-11	12/16/2002	=	15R 03	4	3	3	×	3	×
820-7.5	12/18/2002	7.5	18R 03	3	z,	4	No (2.5)	Ŋ	3
621-11	12/18/2002	Ξ	TKR SS	×	X,	3	M (2.5)	3	×
B21-7.5	12/18/2002	7.5	15R 03	3	Ä	Ζ,	H0 2 5)	4	×
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B21 - 11 5	12/15/2002	3	13R 03	3	27	3	300	3	×

Groundwater Sampling Results:

				Benzane	Toluene	Ethylbenzene	Total Xylenes
Proposed Rem	edial Goal for \	OCs in Ground		530	400	300	5300
Sample I.D.	Date Dapih Rejen	Depth	Rejerance	Berzene	Toluene	Ethylbenzene	Total Xylenes
B1-GW	11/23/2002	6-16	T&R 93	4600	8700 E	1800	5500
MD-118	12::9/2002	6-15	18R 03	1600	1300	310	1200
B29-GW	12:19/2002	6-35	T&R 03	34	22	ND (0.5)	3.3
MD-128	12/:9/2002	6-15	T&R 03	ND (0.5)	0.62	ND (0.5)	ND (1.0)



EXPLANATION

Treadwell & Rollo soil and groundwater sampling location 2002/2003

Proposed Remediation Zone (dimensions approximate) Montymeny Watson soli and growtowallow sample by teaching 1834 and 1835

ABBREVIATIONS
ND(x)= reported below detection limit
NR= not reported
NT= not responsed
T&R 03= Treadwell & Rollo in 2003

Notes:

1. All ground water results reported in micrograms per liter (µg/l);

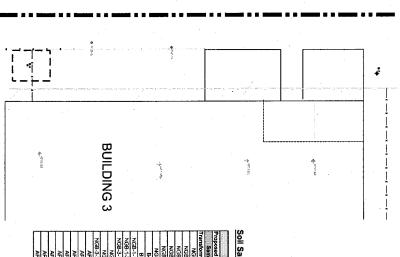
2. All soil sample results reported in miligrams per kilogram (mg/kg).



0' 20' 40' SCALE 1" : 20'

Figure 8
FORMER GASOLINE UST
EXCAVATION AREA 301 Industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01





				Arocior 1254	Arocior 1250 Other PCBs	Other FC88	17736	1770	TEH-MO
Proposed Remedial Goal for Others in Soli	oal for Others I	n Soil		0.22	0.22	22.0	100	500	500
Sample I.D.	Date	Dapth	Reference	Arocior 1254	Aracior 1260	PCBs	TPH-G	TPH-O	TPH-MO
ransformer Area									
NGB-19-2	3/11/2003	22	NG2 03	Z,	ž	ND	NR	7.2	NR.
NGB-19-4.5	3/11/2003	4.5	NG2 03	NZ)	S,	S	<u>ş</u>	2.6	N N
NGB-20-2.5	3/11/2003	2.5	NG2 03	Z,	Z,	N N	줐	ND (0.99)	N.
NGB-20-5.5	3/11/2003	5.5	NG2 03	S	ž	N N	ž	17	X.
NGB-21-1.5	3/11/2003	1.5	80 29N	Ν̈́	ž	Š	ź	1.5	R
NGB-21-5	3/11/2003	5	NG2 03	Z.	Æ	₹	ž	12	ž
B4-3.0	11/21/2002	s	T&R 03	ND (0.1)	ND (0.1)	ND (0.1)	4	1.2	ND (13)
B5-0.5	11/22/2002	0.5	£0 N81	3.2	1,3	ND (0.5)	Ŋ	6880	5600
NGB-1-1, NGB-2-1	3/10/2003		NG2 03	N.	N.R.	ND (0.012)	ND (1)	65	NS R
NGB-1-3, NGB-2-3	3/10/2003	ω	NG2 03	X,	轰	ND (0.012)	ND (1.1)	3.4	₹
NGB-3-1, NGB-4-1	3/10/2003	-	E0 25N	NR	0.014	N/R	ND (1)	27	Z
NGB-3-1	3/10/2003		£0 25₩	ND (0.012)	ND (0.012)	NR	NR.	N#2	Z.
NGB-4-1	3/10/2003	1	NG2 03	ND (0.012)	ND (0.012)	NR.	N.	爱	Ä
NGB-3-3, NGB-4-3	3/10/2003	. 3	NG2 03	NR	N/R	ND (0.012)	ND (0.97)	6.3	NR.
AP14-B1	1995	3.5-8.5	MW RFI	NR	ZĐ	ND	ž	R	ž
AP14-B2	1995	3.5-8.5	MW RFI	NR	35	Š	Ž	š	X,
AP14-B3	1995	3.5-8.5	MW RFI	X.	£	Š	ž	丢	ž
API8-B1	1995	4-8.5	WW RFI	NR.	N.	ND	Z,	Z,	Z,
AP(7-B1	1995	3.0-7.0	MW RF	NR	NN RN	₽ N	X.	NR.	N.R.
AP17-B2	1995	3.5-7.0	MW RFI	NR	N.	ND	NR.	NE.	NR R
AP17-B3	1995	3.5-7.5	IAN WM	NR	NR	NO.	ž	Z	Z,
API7-B4	1995	3.5-7.5	MW RFI	NR	Z,	Š	ž	X,	NR.

Groundwater Sampling Results:

Transferment Off Tarries

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ž	NO (0.5)	5) NO (0.5)	S) ND (0.5	NO (0.5	ND (0.5)	ND (0.5)	ND (0.5)	Ŋ	ž	X,	3	ND (0.5)	ND (0.5)	76R 93	6-95	11/22/2002	B4-GW
																•	Fransformer Area
brans-1,2-DCE	cis-1,2-DCE	E 1,2-0CA	1100	1.18	11270	1111TCA	Virryl Chloride	Total Xylenes	Ethylbertzena	Toluena	Berrette	Ž	TCE	Reference	Depth	Date	snyse I.D.
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Fams-1,2-DCE	cis-1,2-DGE	E 1,2-0CA	1.700	100	1,1,2,70	1.1,1.1CA	Vinyl Chloride	Total Xylenes	Ethylbenzerie	Tolueba	Berzene	70	TOE				

EXPLANATION Storm drain system Sewer Line Fence

Treadwell & Rollo soil sampling location 2002/2003 Treadwell & Rollo soil and groundwater sampling location 2002/2003

CONTRACTOR ORPHOSE FOR PROGRAMMENT SHEET SHOW

Aqua Solmos soli campie lucation 1997

Proposed Remediation Zone (dimensions approximate)

ABBREVIATIONS

ND(r)= reported below detection limit
NR= not reported
NR= not reported
NR= not resided analyzed
TaR CRS Trackwell R Robin in 2003
TAR CRS Trackwell R Robin in 2003
NV2 DRS—Second Vioritypation in realitypation in 2003
NW PSP = Mongomery Weston RCIRA Facility investigation in
1985

Notes:

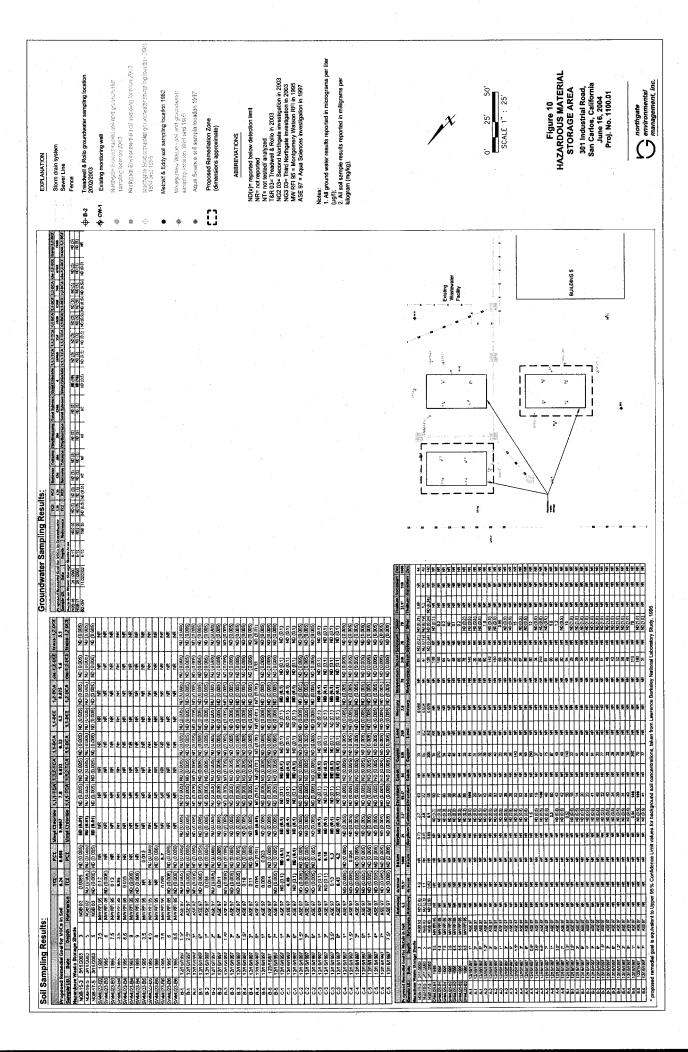
1. All ground water results reported in micrograms per liter (µg/l);

2. All soil sample results reported in milligrams per kilogram (mg/kg).



Figure 9
TRANSFORMER AREA
301 Industrial Road,
San Carlos, California
June 16, 2004
Proj. No. 1100.01





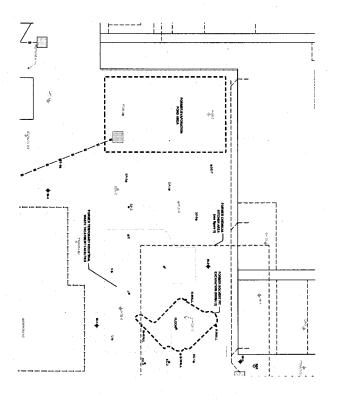
Groundwater Sampling Results:

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L																		Shop Area	nics Plating S	Former Cerar
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Soil Sampling Results:

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		NO (3,005) NO (0,005) NO	3N (SOCIE) ON (SOCIE) ON	NO (0.005) (NO (0.005) (NO	NO (0.005) NO (0.005) NO	30 (Side to the (South day)	NO (3,005) NO (3,005) NE	# 1,4,1CA 1,1,2,1CA 1	7.8 6.633	E 1,51 (CA 1,5,2 (CA 1	-
		NO (3,005) NO (3,005) NO (ON (SOCIE) ON (SOCIE) ON	AD (0.005) AD (0.005) NO (NO (0.005) NO (0.005) NO (JON (5008) ON (500C) CK	NO (3,005) NO (3,005) NO (1,1,1-1CA 1,1,2-1CA 1,5	7.8 0.833 0	E 11.1-1CA 1,12 TCA 1.5	
		NO (3,005) NO (0,005) NO (0.	3) ON (SOCIO) ON (SOCIO) ON	(a) GM (2005) NB (2005) NB (0.	NO (0.005) (NO (0.005) (NO (0.	30 CN (\$308) ON (\$000) CK	20 GM (2005) NO (0 505) NO (0	b 1,1,1-1CA 1,1,2-1CA 1,1-0	7.8 6.833 6.3	# 111.11CA 1112.1CA 13-0	
		NO (3,005) NO (3,005) NO (6,00	00:0) ON (500:0) ON (500:0) ON	2000) Onli (2000) IND (2000) Onli	NO (0.005) NO (0.005) NO (0.06	30 CO (SOC ON (SOC) OF	NO (3,005) NO (3,005) (NO (3,006)	be 1,6,5-1CA 1,9,2-1CA 1,5-8C	7.8 8.813 8.33	E 1231CA 1321CA 1340C	
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		NO (3,005) NO (0,005) NO (0,005) I	(SOC 3) ON (SOC 6) ON (SOC 6) ON	ne (0.005) ne (0.005) ne (0.005)	NO (0.005) NO (0.005) NO (0.005) I	10 (3000) W (3000) NO (3000)	NO (3005) NO (330-0) (NO (3005) (NO	MANAGE MAJATCA 15-BCA	7.8 8.833 8.33	E 1,5,1 (CA 1,5,2 (CA 1,5-0CA	
		PAD (2,005) PAD (0,005) PAD (0,005) PAD	N (300.0) (N (300.0) (N (300.0) (N	No (0.005) No (0.005) No (0.005) No	NO (0.005) NO (0.005) NO (0.005) NO	N (Sec.) ON (SOCE) ON (SOCE) ON	PAD (3,0005) PAD (3,0005) PAD (0,0005) PAS	14,1-1CA 14,2-1CA 1,5-BCA 3	7.8 6.833 6.33	E 1,5,17CA 1,5,2 TCA 1,5-BCA 1	
		NO (3,005) NO (0,005) NO (0,005) NO ((ON (SOC 0) ON (SOC 0) ON (SOC 0) ON	20 (0.005) NB (0.005) NB (0.005) NB (NO (0.005) NO (0.005) NO (0.005) NO (10N (5000) ON (5000) ON (5000) OC	PAD (3,0005) PAD (3,0005) PAD (0,0005) PAD (to 1,6,1-TCA 1,9,2-TCA 1,5-BCA 1,5	7.8 6.633 6.33	te 1,1,1,104 1,12,104 1,1-BCA 1,1	
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		NO (3,005) NO (0,005) NO (0,005) NO (0,00	00 01 0N (S00 0) ON (S00 0) ON (S00 0) ON	100 (0.005) (400.0) (200.0) (400.0) (400.0) (400.0) (400.0)	(0.00) ON (0.000) ON (0.000) ON (0.000) ON	50 0) (Sec 5) (Sec 5) (Sec 6) (Sec 6) (Sec 6) (Sec 6) (Sec 7)	30 O CH (300 O CH (300 C) OH) (300 O OH) (300 C) OH	M MATTER MARTER LIBER MARE	7.8 4.833 8.33 4.3	E 1,5 1/CA 1,52 1/CA 1,5-B/CA 1,5-B/C	-
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- EXPLANATION

 Existing monitoring well

 Monitoring well not located

 Storm drain system

 Server Line

- Treedwelf & Rollo groundwater sampling location 2002/2003
- readwell & Rollo soil sampling location 002/2003
- eadwell & Rollo soil and groundwater sampling cation 2002/2003
- Treadwell & Rollo soil gas sampling location (2-feet deep) 2002/2003
- tyfijate Thúrcheadh ha hheddy' Cainn Add Lafynd Acarenaeth sal am ganotheid wahng bester 2003
- Kennedy Jenks soil sampling location 1985 Metcalf & Eddy soil sampling location 1982
- Vanuhend Clyts grandwater sampling location 1884 Perogren soil samples iosation 1892 Perogrenokladien soil semidise bostion 1892
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- Excavation by Kennedy Jenks

All ground water results reported in micrograms per titer (µg/l);
 All soil sample results reported in milligrams per kilogram (mg/kg).

ABBREVIATIONS
ND(x)= reported below desertion limit
NR = not reported
NT = not tested/analyzed
NG2 03= Second Northgate investigation in 2003

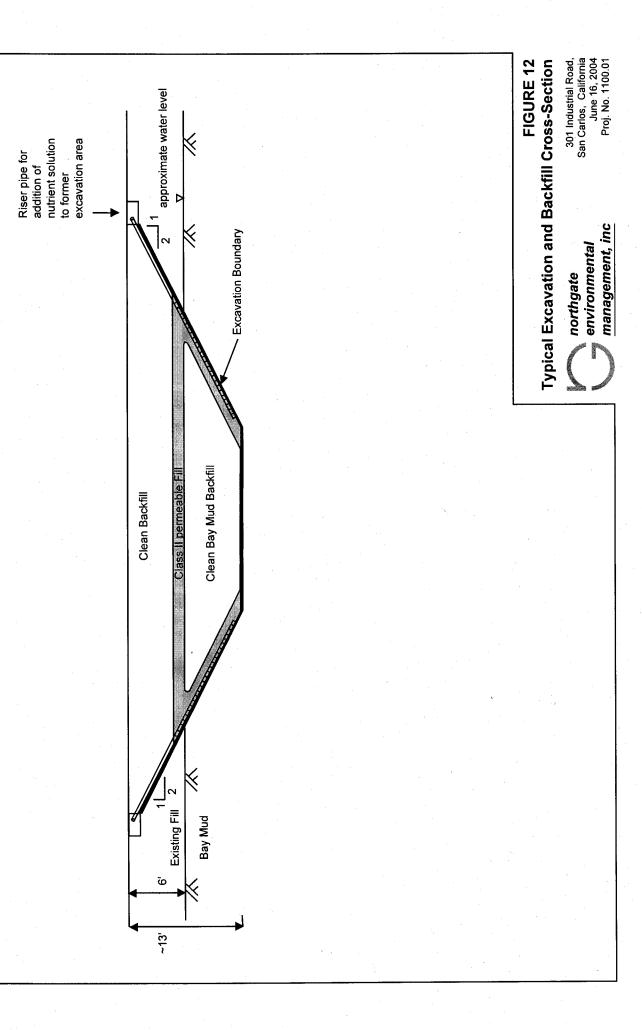


Figure 11
FORMER EVAPORATION
POND AREA

301 Industrial Road, San Carlos, California June 16, 2004 Proj. No. 1100.01







APPENDIX A

REGULATORY APPROVAL LETTERS

- 1) Recommendation for No Further Action (DTSC, 7/21/1998)
- 2) Closure Certification Approval for CPI (DTSC, 12/31/1997)
- 3) Former Varian Power Grid Tube Products Facility, Closure of Former Chemical Kitchen (Cal-EPA/RWQCB, 12/24/1996)
 - 4) Closure of Sumps SWMU 14 and SWMU 15, Former Varian Power Grid Tube Products (San Mateo County Health Services Agency, 1/16/1996)
 - 5) Approval of RCRA Facility Investigation Report for Varian Power Grid Tube Products (DTSC, 7/31/1995)
- 6) Closure of Former Drum Storage Area and Cleanup of Former Solvent Pit and Former Evaporation Ponds (DTSC, 8/14/1985)



Recommendation for No Further Action

Communications and Power Industries 301 Industrial Way San Carlos, CA 94070 CUPA: San Mateo County Contact: Tom Huynh, Safety Representative

MEDIUM PRIORITY FURTHER INVESTIGATION NEEDED

Date Assigned:

July 7, 1998

File Review:

July 8, 1998

Site Visit:

July 15, 1998

Meetings/Misc:

July 8, 1998 call

FIS OK date:

July 15, 1998

Case Closure:

July 15, 1998

TYPE OF OPERATION/POTENTIAL CONTAMINANTS

A manufacturer of cathode ray tubes used in radar and other equipment. Metals from plating operations are produced as hazardous waste.

. Phone Call 7/8/98

I talked with Mr. Jim Millie, a consultant for Communications and Power Industries about a date that I would be able to do a walkthrough inspection of this facility. He also told me that an RCRA Facility Assessment had been done at this site with cleanup action completed and approved.

Chronology of Events/History of Site

The first buildings at this site were constructed in 1956-57. In 1965 Varian bought the site and started production. Communications and Power Industries (CPI) bought the Varian production operation of cathode ray tubes in 1995.

A phase one was submitted in June 1998 indicating one area of concern (AOC). The one area of concern was where a large industrial oven stood. When the oven was removed, three concrete lined holes were found that allowed room for three hydraulic arms to move vertically.

Notes (from visits/calls/meetings):

7/15/98 Site Visit

I met with Tom Huynh, Safety Representative of (CPI) and Jim Mille, consultant of Chemical Solutions. In the main production building taped off with yellow warning tape was located the AOC. On the floor were three holes covered with metal grates. I looked into the hole and observed standing water in all three holes and a cement bottom and metal lined sides. Mr. Mille and Mr. Huynh explained to me that the standing water was still present from a leak test that was

done. They also showed me where a boring of cement had been done next to one of the holes to find out the thickness of the cement structure around the holes. From the boring it appeared that at least one foot of concrete surrounded these holes. I asked if very much hydraulic fluid was found inside any of the holes and Mr. Millie told me that some residual amounts were found that were cleaned out.

We next went outside the building to the PBR treatment unit which treats metals from the plating that is done in the production process. The treatment unit had secondary containment that was P.E. certified.

I asked if I could review the submittals and work that was done for the cleanup. In a file room I looked at the RCRA Facility Assessment for CPI that was done June 1994. This assessment was done by DTSC Region 2 office and identified 24 solid waste management units (SWMU) and 10 areas of concern (AOC). Of this Total, 7 SWMU's and 3 AOC's were deemed to need further investigation. Samples were taken and a June 1995 Montgomery Watson report recommended closure of the 7 SWMU's and 3 AOC's. Mr. Mille said that all the SWMU's and AOC's were approved for closure by the County of San Mateo or DTSC.

RECOMMENDATIONS/REASONS FOR NO FURTHER INVESTIGATION OR **CORRECTIVE ACTION**

I talked with Sal Ciriello of Department of Toxic Substances Control Permitting Division and verified that DTSC had approved the RFI report and CPI is now considered closed. All oversite for cleanup was done by DTSC or the County of San Mateo, Environmental Health. The three concrete lined holes appeared to be clean and leak testing did not reveal any breakthrough in containment. Based on information provided by CPI and DTSC, I recommend that no further investigation or corrective action be done at this time.

7/2//98 Date

Hazardous Substances Scientist Dept. of Toxic Substances Control

Closure Certification Approval for CPI



CallEPA

December 31, 1997



Pere Wilson Governor

Secretary for Environmental Protection

Department of Toxic Substances Control

700 Heinz Avenus Suite 200 Berkeley, CA 94710-2737 Mr. Tom Huynh Environmental & Safety Engineer CPI-Eimac 301 Industrial Way San Carlos, CA 94070-2682

Dear Tom Huynh:

CLOSURE CERTIFICATION APPROVAL FOR COMMUNICATIONS & POWER INDUSTRIES, INC., EIMAC DIVISION, 301 INDUSTRIAL WAY, SAN CARLOS, EPA ID NO. CAD 009 438 300

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), has received the closure certification report dated December 23, 1997 for Communications and Power Industries, Inc., Eimac Division (CPI-Eimac). This report certifies that the closure of the permitted hazardous waste storage areas, Sheds A, B and C, were performed in accordance with the approved closure plan.

We hereby approve your closure certification report and now consider these storage areas at CPI-Eimac officially closed. We understand that the permitted treatment units are now regulated under Permit-By-Rule authorization. The permit for this facility is no longer in effect

This acknowledgment of facility closure does not remove any liabilities associated with past hazardous waste management practices which may have occurred at the site.

If you have any questions, please comact Alfred Wong of my staff at (510) 540-3946.

Sincerely,

Fan James M. Pappas, P.E., Chief Northern California Permitting

Branch

cc: See next page

Mr. Tom Huynh December 31, 1997 Page 2

cc: Mr. John McCarroll
U.S. EPA, Region IX, H-3
75 Hawthorne Street
San Francisco, California 94105

Mr. Alfred Wong Northern California Branch Permitting Division 700 Heinz Avenue, Suite 200 Berkeley, California 94710

Ms. Charlene Williams, Chief Northern California Branch Statewide Compliance Division 700 Heinz Avenue, Suite 200 Berkeley, California 94710 Former Varian Power Grid Tube Products Facility, Closure of Former Chemical Kitchen





San Francisco Bay

Regional Water

Quality Control

Board

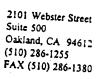
SAN MATEO COUNTY ENVIRONMENTAL HEALTH

JAN - 9 1997

RECEIVED

Date: December 24, 1996 File No: 2189.8291 (RAD)

Governor



Mr. John Buchanan Varian Associates 3120 Hansen Way Palo Alto, CA

94304

SUBJECT:

Former Varian Power Grid Tube Products Facility

301 Industrial Way

San Carlos, San Mateo County Closure of Former Chemical Kitchen

Dear Mr. Buchanan:

Board staff has reviewed your report, dated August 22, 1996 for the above site. The report evaluates the remaining chemicals and associated risks in the former chemical kitchen, and recommends closure for this part of the site. As explained below, I concur that additional investigations in the chemical kitchen area are not needed until the land use changes and/or the building is demolished. The chemical kitchen area may be remodeled to fit the current

Soil contamination includes TCA up to 130 ppm and DCE up to 15 ppm. Groundwater contamination includes TCA up to 22,000 ppb and DCE up to 3,600 ppb. The groundwater table is approximately 6 to 10 feet below ground surface (bgs). Bay Muds predominate from 4 to 20 feet bgs. Stiff, sandy to silty clay extend from below the Bay Muds to at least 80 feet bgs.

Soil contamination is localized within the chemical kitchen and is limited to a depth of less than 30 feet. All possible VOC sources have been removed. VOCs in soil are degrading naturally and are not present directly beneath the concrete floor.

Groundwater beneath the site is not considered a source of drinking water and remaining VOC concentrations in the soil and groundwater are not a significant freat to water quality. The groundwater is brackish (TDS greater than 3,000 mg/l) and more than 200 gallons per day cannot be extracted. Monitoring shows that groundwater contamination is limited to a depth of less than 30 feet and has not migrated beyond the chemical kitchen. Clay-rich soils limit groundwater movement and little migration is expected.

Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and officient use for the benefit of present and future generations. ±

Remaining VOCs in soil and groundwater do not pose an unacceptable risk to current and future workers as long as CPI continues to use the area as an industrial manufacturing facility, and if the concrete floor or its equivalent remains. Varian will address potential remediation of the remaining soil and groundwater contamination when the building is removed and/or when there is a change in the actual use of the site.

Please contact Rico Duazo at (510) 286-0837 if you have any questions.

Sincerely,

Loretta K. Barsamian Executive Officer

Stephen I. Morse

Chief, Toxics Cleanup Division

cc: Sabrina Mih, San Mateo County DHS Leilani Nieves, CPI, Inc. Al Wilunowski, CPI, Inc.

Closure of Sumps SWMU 14 and SWMU 15 Former Varian Power Grid Tube Products



HEALTH SERVICES AGENCY

NVIRONMENTAL HEALTH SERVICES DIVISION

January 16, 1996

Mr. Michael D. Basel, Ph.D., P.E. Montgomery Watson 365 Lennon Lane Walnut Creek, CA 94598-2427

SUBJECT: Closure of sumps SWMU 14 and SWMU 15, Former Varian Power Grid Tube Products, San Carlos, CA

This letter confirms the closure of two concrete lined sumps under the direction of San Mateo County Environmental Health Services at the subject site. Provided that the information submitted to this agency was accurate and representative of existing conditions, it is our position that no further action is required at this time.

Please be advised that this letter does not relieve you of any liability under the California Health and Safety Code or Water Code for past, present, or future operations at the site. Nor does it relieve you of the responsibility to clean up existing, additional, or previously unidentified conditions at the site which cause or threaten to cause pollution or nuisance or otherwise pose a threat to water quality or public health.

Additionally, be advised that changes in the present or proposed use of the site may require further site characterization and mitigation activity. It is the property owner's responsibility to notify this agency of any changes in report content, future contamination findings, or site usage.

Thank you for your cooperation in this matter. I may be reached at (415) 363-4565.

Sincerely.

Teresa Belasco, REHS, MPH

Hazardous Materials Specialist IV

cc: Bill Lent, Hazardous Materials Program Manager
Sabrina Mih, Hazardous Materials Specialist, County Remedial Oversight Program

SAN MATEO COUNTY BOARD OF SUPERVISORS
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HEALTH SERVICES AGENCY DIRECTOR
MARGARET TAYLOR

ENVIRONMENTAL HEALTH SERVICES DIVISION DIRECTOR BRIAN ZAMORA, MPH, REHS

590 HAMILTON STREET, REDWOOD CITY, CALIFORNIA 94063 PHONE (415, 363-4305 * TDD (415) 573-3206 * FAX (415) 363-7882 Approval of RCRA Facility Investigation Report for Varian Power Grid Tube Products



DEPARTMENT OF TOXIC SUBSTANCES CONTROL

ION 2 HEINZ AVE , SUITE 200 BERKELEY, CA 94710-2737

July 13, 1995



RECEIVED

Mr. Gregory Hall Environmental Engineer Varian Power Grid Tube Products 301 Industrial Way San Carlos, California 94070

Dear Mr. Hall:

APPROVAL OF RCRA FACILITY INVESTIGATION REPORT (RFI) FOR VARIAN POWER GRID TUBE PRODUCTS, EPA ID N_0 .: CAD 009438300

The Department of Toxic Substances Control (DTSC) has reviewed the RCRA Facility Investigation Final Report (Report), submitted June 19, 1995, for Varian Power Grid Tube Products (Varian) at 301 Industrial Way in San Carlos. DTSC issued a Hazardous Waste Facility Permit to Varian on February 16, 1995. This permit required Varian to investigate five Solid Waste Management Units (SWMUs) at the site. The RFI Workplan was approved April 5, 1995. The SWMUs required to be investigated were SWMUs 7, 11, 12, 13, and 14. The Report discussed the results of the investigation conducted at Varian and concluded that no further action is needed for SWMUs 7, 11, 12, 13, and 14. DTSC hereby approves the Report and concurs that no further action is needed for SWMUs 7, 11, 12, 13, and 14. Therefore, there is no requirement to proceed onto the next step of the corrective action process which is normally a corrective measures study.

DTSC acknowledges that Varian also is investigating SWMUs 15 and 16 and AOCs 11, 14, and 16 under the supervision of the San Mateo County Department of Health Services. A copy of the final report on these SWMUs and AOCs shall also be submitted to DTSC. DTSC reserves the right to require further investigation of these SWMUs and AOCs if, at any time, DTSC determines that any investigation being conducted does not meet State or federal standards.

Sincerely,

Lester Kaufman, Chief

Facility Permitting Branch

cc: (See next page)

Closure of Former Drum Storage Area and Cleanup of Former Solvent Pit and Former Evaporation Ponds



DEPARTMENT OF HEALTH SERVICES
2151 BERKELEY WAY
BERKELEY, CA 94704
(415) 540-2043



August 14, 1985

Mr. Tom Novack Varian Eimac Division 301 Industrial Way San Carlos, CA 94070

Dear Mr. Novack:

This letter confirms the discussion and observations of the June 21, 1985 inspection of the Varian - Eimac facility by Elyse Heilshorn of my staff.

The closure of the former drum storage area is approved and considered complete by the Toxic Substances Control Division of the California Department of Health Services (DHS). You may use this area for other facility activities.

The clean-up of the former solvent pit and former evaporation ponds is approved by DHS. Varian may use these areas as deemed apropriate.

The sampling plan for the former wastewater treatment area is approved Please proceed with the work. Please notify DHS 48 hours prior to sampling.

The expansion of the wastewater treatment facility to include chrome reduction is approved. Please submit any necessary changes in the Operation Plan to reflect changes in operations, clean ups, training, and closure procedures and costs. This information shall be submitted to DHS prior to operating the new treatment system.

Please submit: Photographs of the solvent pit excavation, photos of the closed drum storage area, and copies of the manifests from the excavation as requested during the June 21, 1985 inspection.

If you have any questions, please call Ms. Heilshorn at 540-3052.

RECEIVED

AUG 16 1985

MALLY OBLOW

Sincerely,

Dwight R. Hoenig, Chief

North Coast California Section Toxic Substances Control Division

EH:rvh

VA-200-030178

APPENDIX B LIST OF REPORTS

APPENDIX B List of Reports

TITLE	AUTHOR	DATE
Geotechnical Investigation Report Varian	Kleinfelder & Associates	February 1, 1984
	Riemieider & Associates	rebluary 1, 1964
EIMAC San Carlos	Makasif O Eddy Engineers	May 5, 1094
Report of Field Investigations-Metal	Metcalf & Eddy Engineers	May 5, 1984
Concentrations in Soils EIMAC Division of		
Varian Associates	NA (160 E 14 E	M5 4004
Report of Field Investigations-Volatile Organic	Metcalf & Eddy Engineers	May 5, 1984
Chemicals EIMAC Division of Varian		
Associates		- 1001
Report of Field Investigations-Methanol EIMAC	Metcalf & Eddy Engineers	May 5, 1984
Division of Varian Associates		
Environmental Investigation Report Varian	Kleinfelder & Associates	November 1, 1984
EIMAC San Carlos		
Final Report on Soil and Groundwater	Kennedy/Jenks Engineers	March 13, 1985
Contamination Assessment at Varian-EIMAC's		·
Former Methanol Storage Area		·
Final Report on the Assessment of Inorganic and	Kennedy/Jenks Engineers	April 1, 1985
Organic Chemicals in the Soil and Grounwater at		
Varian-EIMAC's Former Hazardous Waste Drum		* .
Storage Yard		
Remedial Action Activities at the Former	Kennedy/Jenks Engineers	April 22, 1985
Evaporation Ponds and Rormer Solvent Dry		
Well Varian-EIMAC		
Assessment of Chemicals in Soil at the Former	Kennedy/Jenks Engineers	October 1, 1985
Temporary Wastewater Treatment Plant Site		
	i	·
Geotechnical Consultant Approval-County of	County of San Mateo Dept of	June 26, 1989
San Mateo	Public Works Geotechnical	
	Section	
Report of Building Survey for Asbestos	Law Associates	June 15, 1990
Containing Materials		
Containing Materials Revised Partial Closure Certification Report	PES Environmental Engineering	February 12, 1991
Revised Partial Closure Certification Report	PES Environmental Engineering & Environmental Services	
Revised Partial Closure Certification Report Chrome Reduction Wastewater Treatment		
Revised Partial Closure Certification Report Chrome Reduction Wastewater Treatment Varian EIMAC San Carlos Division	& Environmental Services	February 12, 1991
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Revised Partial Closure Certification Report Chrome Reduction Wastewater Treatment Varian EIMAC San Carlos Division Closure Report, Four Plating Areas, Vaian Associates	& Environmental Services Peregren Environmental Group	February 12, 1991 August 13, 1992
Revised Partial Closure Certification Report Chrome Reduction Wastewater Treatment Varian EIMAC San Carlos Division Closure Report, Four Plating Areas, Vaian Associates Phase II Soil Investigation, Former Plating	& Environmental Services	February 12, 1991
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APPENDIX B List of Reports

TITLE	AUTHOR	DATE
Letter to Daniel Peixoto: Environmental	Montgomery Watson	April 21, 1995
Complianace Analysis of Power Grid Tube	·	
Final Report of Results RCRA Facility and	Montgomery Watson	April 28, 1995
Phase II Investigations Vol. 1 of 2		
RCRA Facility Investigation Final Report and	Montgomery Watson	June 1, 1995
Summary Report Varian Power Grid Tube	·	
Products		
RCRA Facility Investigation Final Report and	Montgomery Watson	June 1, 1995
Summary Report Varian Power Grid Tube		1
Products		
Closure Report for Former Drum Storage Area,	Montgomery Watson	June 1, 1995
Former Chemical Kitchen, Former Ceramics		
Painting Shop, etc.		
Due Diligence Assessments Varian EDB	ICF Kaiser Engineers	August 10, 1995
Facilities	·	
Compliance Assessment Communications &	ICF Kaiser Engineers	January 11, 1996
Power Industries	'	
Final Report of Results Additional Field	Montgomery Watson	February 1, 1996
Investigation Former Varian Power Grid Tube		
Products		
Human Health Risk Assessment Former Bldg 2	Montgomery Watson	August 1, 1996
Drum Storage Area		
Closure Report of Hazardous Waste Storage	Aqua Science Engineers	December 23, 1997
Area		
Expanded Phase I Environmental Site	P & D Consultants	October 6, 2000
Assessment		
Updated Human Health Risk/Remedial	Montgomery Watson Harza	February 27, 2002
Alternatives Evaluation (Letter to Michael Cheng:		
Updated Human Health Risk)		
Final Report Asbestos-Containing Materials and	Pinnacle Environmental	December 3, 2002
Lead Coatings Survey Buildings 1, 2, 3 and 5		
Memo to D. Dixon, Treadwell & Rollo, Data	Northgate	June 2, 2003
Transmittal for Northgate Investigations at 301		*
Industrial Rd		



environmental management, inc.

August 25, 2004

Mr. Stephen I. Morse Assistant Executive Officer San Francisco Regional Water Quality Control Board 1515 Clay Street, Suite 1400 Oakland, California 94612

Re: Remedial Action Plan Addendum 301 Industrial Way San Carlos, California Project No.: 1100.03

Dear Mr. Morse:

Northgate Environmental Management, Inc. (Northgate) is pleased to present this addendum to our June 16, 2004 *Remedial Action Plan, 301 Industrial Way, San Carlos, California*. This addendum has been prepared to address issues discussed with you during the August 11, 2004 meeting regarding the Remedial Action Plan (RAP). The additional information presented includes the following topics:

- Overview of the proposed remedial action process;
- Decision tree for the proposed investigation and remediation activities;
- Confirmation sampling protocols;
- Proposed approach for removal and investigation of underground utilities;
- Proposed approach for the post-remediation risk assessment;
- Post-remediation contingency planning; and
- Proposed schedule for Regional Water Quality Control Board (RWQCB) communications.

Each of these topics is addressed in detail below.

Overview of the Proposed Remedial Action Process

The proposed remedial action process will begin with the shutdown of the current facility operating at 301 Industrial Road. The facility is currently owned and operated by Communications & Power Industries (CPI). CPI will be responsible for closing down operations, which includes removal of all equipment and hazardous materials stored on site.

CPI will also decontaminate and/or dispose of hazardous building materials/piping (other than to be performed by 301 Industrial LLC as described below). The San Mateo County Department of Environmental Health will oversee this work. Any soil or groundwater remediation required for such closures will be performed under the direction of the RWQCB. Once CPI has completed its shutdown and vacated the facility, only major structures will remain on site. CPI is expected to complete its closure process and vacate the site in 30 months or less.

Once CPI has vacated the site, 301 Industrial LLC will then clear the buildings and structures of asbestos containing materials (ACMs) and other remaining hazardous materials (e.g., mercury switches, fluorescent light tubes and ballasts, etc.). During this time, site features will be surveyed, as necessary, to provide an accurate site map for future sampling and remediation activities. The buildings will then be demolished. All foundations and surface-grade structures will also be removed. The parking area at the southern/southeastern area of the site will likely be retained at this time as a staging area, but will later be removed. This process is anticipated to require approximately 6 months. Approximately 60 days before commencement of demolition activities at the site, 301 Industrial LLC will submit a Field Sampling Plan (FSP) and Health and Safety Plan (HSP) to the RWQCB for review and approval.

After the site areas are cleared of buildings and structures, all of the known contaminated soil and groundwater will be remediated. It is anticipated that some overlap will occur between work on different areas of the site. The order in which areas of the site will be addressed depends on logistical considerations to be identified in the field. Waste soil and water requiring off-site disposal will be temporarily stored on-site and hauled away incrementally, although the number of waste-hauling events will be scheduled to reduce the impact on local traffic. This process is anticipated to require approximately 14 months.

Once remedial activities have been completed, all contractors and equipment will be demobilized and, following RWQCB approval, areas of the site may be rough graded in anticipation of future construction activities.

Decision Tree for the Proposed Investigation and Remediation Activities

Figure 1 incorporates the complete investigation and remediation decision tree process.

Confirmation Sampling Protocols

The confirmation sampling protocols are also shown in the attached investigation and remediation decision tree process figure (Figure 1). Additional information regarding confirmation sampling protocols will be presented in the FSP, which will include both a Sampling and Analysis Plan (SAP) and a Quality Assurance Project Plan (QAPP). All data screened against remedial goals to confirm site cleanup will be produced by a certified mobile and/or fixed laboratory.



Proposed Approach for Removal and Investigation of Underground Utilities

All underground utilities on site will be identified, closed, and removed during the investigation and remediation process by 301 Industrial LLC. In addition, all backfill surrounding the utilities will also be removed. As utilities are removed, the trenches will be inspected for potential contamination issues. If a utility passes through a remediation zone or shows signs of potential contamination, the utility trench and related backfill will be handled and investigated per the remedial approach discussed in Section 5 of the RAP.

Proposed Approach for the Post-Remediation Risk Assessment

Once remediation of the site has been completed, a human health risk assessment (HHRA) will be performed for the entire site by qualified and experienced risk assessment professionals. This HHRA will be performed based upon data that reflects the then current conditions at the site (viz. confirmation samples of soil, soil gas, and groundwater representing media that have not been removed). The HHRA will be conducted in accordance with the Risk Assessment Guidance for Superfund Human Health Evaluation Manual (EPA/540/1-89/002) considering a scenario for unrestricted use. It will include both an assessment of current site conditions and an assessment of future site conditions once the site has been redeveloped. Prior to preparing the HHRA, the detailed scope of the assessment will be discussed with the RWQCB in a meeting once remedial activities are largely completed.

Post-Remediation Contingency Planning

Although it is not anticipated, given the extensive historic research and field sampling that has been completed, there is a small possibility that once remedial activities are completed at the site and the RWQCB has issued a No Further Action letter, previously unidentified area(s) of contamination could be discovered, especially during the construction phase which will immediately follow remediation. If this occurs, construction work in the immediate vicinity of the potentially affected area will be halted as soon as the potential contamination is identified and the area will be investigated and remediated consistent with the RAP. This is defined as "contingency work." During any contingency work, the RWQCB will receive periodic updates; a completion report for the contingency area will be submitted to and approved by the RWQCB. In addition, if contamination in the contingency area has the potential to impact the HHRA, an addendum to the HHRA will be prepared to address the affected area.

Proposed Schedule for RWQCB Communications

During the current facility closure process, quarterly updates will be provided to the RWQCB. Once the facility is ready for commencement of building demolition, a schedule with milestones will be submitted to the RWQCB. This schedule will serve as a launching point for establishing a communication schedule and protocols for the investigation and remediation phase of the project.



CLOSING

We hope this addendum has provided sufficient clarification on the issues discussed at the August 10, 2004, meeting. If you should have any questions or require additional information, please feel free to contact either of the undersigned.

Sincerely,

Northgate Environmental Management, Inc.

allen Z Tento

Alan Leavitt, P.E.

Principal

James Schwartz, R.G. Senior Project Geologist

Attachments

Figure 1 – Decision Tree

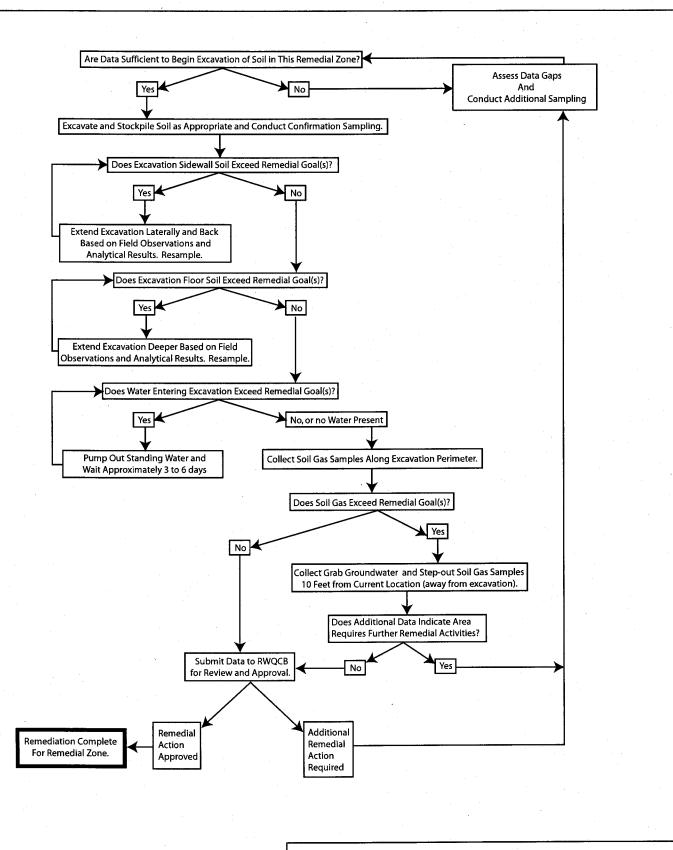


FIGURE 1 DECISION TREE

Remedial Action Plan Addendum 301 Industrial Way Palo Alto, California August 2004



California Regional Water Quality Control Board San Francisco Bay Region

Exhibit C to Mutual Release Attachment to Resolution No. R2-2004-0087

Written Instrument Of Release And Transfer Document

[name of new purchaser, lender, lessee, or occupant] (hereinafter "Released Party"), by signing below verifies and warrants as follows:
1. Released Party has read the recorded Mutual Release and Covenant Not to Sue ("Mutual Release") document, and the related Regional Water Quality Control Board (Regional Board) Resolution No. R2-2004-XXXX, including Attachment and Exhibits recorded in Book in San Mateo County, California for the "Property" located at 301 Industrial Way in the City of San Carlos, San Mateo County, California.
2. Released Party understands and agrees that the Mutual Release contains a release by the Regional Water Quality Control Board ("Regional Board") and a covenant not to bring or support any action or order against subsequent purchasers, tenants, lenders, and occupants of all or a portion of the Property (as defined in the Mutual Release), including their directors, officers, shareholders, managers employees, partners, affiliates, members, contractors, agents, successors, and assigns, related to the Known Conditions (as defined in the Mutual Release), including contamination at, under, or originating from the Property (as defined in the Mutual Release).
3. Released Party understands and agrees that it may enjoy the benefits of the Mutual Release only if it releases and covenants not to sue the Regional Board as set forth in the Mutual Release and that by executing this Release, Released Party releases and covenants not to sue the Regional Board in accordance with the terms of the Mutual Release.
4. Released Party understands and agrees that its right to rely on the benefits of the Mutual Release is subject to and conditioned on its own, but only its own, acceptance of all of the provisions of the Mutual Release and its compliance with its obligations under the terms of the Mutual Release.
5. Released Party accepts and agrees to abide by all provisions of the Mutual Release.
This Instrument of Release and Transfer Document shall be effective upon execution by the Released Party. Within three days of execution, Released Party agrees to mail a copy of the executer Release to: Executive Officer, Regional Water Quality Control Board, San Francisco Bay Region (address as of October 20, 2004, is 1515 Clay Street, Suite 1400, Oakland, CA 94612).
Authorized Signature (Released Party) Date
Name/Title:
Company Name/Address: